Future Development Strategy

Organisations

WRITTEN FEEDBACK
Volume 7

Date published: **Friday, 10 August 2023**

Future Development Plan 2023 #8179

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why
See attached submission

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why
See attached submission

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why
See attached submission

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why
See attached submission

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

See attached submission

SUBMISSION ON DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY

TO: Auckland Council ("**Council**")

SUBMITTER: Auckland International Airport Ltd ("**Auckland Airport**")

Summary

1. Auckland Airport welcomes the opportunity to submit on the Draft Auckland Future Development Strategy ("**Draft FDS**"), which proposes changes to the vision for how and where Auckland is to grow over the next 30 years.

2. Auckland Airport is a strategic infrastructure asset of local, regional and national importance. As the primary gateway to New Zealand, the Airport is a significant contributor to the regional and national economy and is critical to New Zealand's trade and tourism industries.

3. It is fundamental that Auckland's planning framework adequately provides for the Airport's operations and ability to function efficiently. Any future development in the areas surrounding the airport must not hinder the airport's operation and ongoing development. The nature of Auckland Airport's operations is such that land use change and intensification must be proactively managed to protect the Airport from reverse sensitivity effects.

4. Auckland Airport is of the view that in its current form, the Draft FDS supports development which will generate adverse risks for Auckland Airport going forward. In particular, the Draft FDS:

   (a) does not adequately address current or future management of reverse sensitivity effects on infrastructure;

   (b) promotes additional development within the Airport's effects areas that may be inappropriate; and

   (c) fails to appropriately incorporate Auckland Airport and its assets in the integrated infrastructure planning promoted for the region.

5. Without amendment to appropriately reflect Auckland Airport, its planned growth, and the necessary management of surrounding development to protect its operation, the Draft FDS encourages development in areas which risks undermining the future operation and development of Auckland Airport. This must be amended to achieve the best outcomes for integrated infrastructure planning and a well-functioning urban environment.

Key statutory requirements

6. The National Policy Statement on Urban Development 2020 ("**NPS-UD**") provides the legal basis for preparing the Draft FDS.[1] The NPS-UD clarifies its purpose to promote long-term strategic planning by setting out how the Council intends to achieve well-functioning urban environments in both its existing and future urban areas and provide sufficient development

[1] NPS-UD, clause 3.12.

capacity as required by the NPS-UD over the next 30 years. The NPS-UD indicates that regard must be had to the nuances of specific environments, including the appropriate type, scale and location of housing, depending on the particular context.

7. The Draft FDS is intended to assist the integration of planning decisions under the Resource Management Act 1991 ("**RMA**") with infrastructure planning and funding decisions.[2] Once an FDS is prepared, the Council will be required to have regard to it when preparing or changing RMA planning documents.[3] The importance of the Draft FDS to the future planning of Auckland is therefore fundamental and will have significant impacts on both housing, but also existing infrastructure like Auckland Airport.

8. In developing the Draft FDS, the Council must consider a number of critical national and regional planning documents. These include infrastructure strategies or any other relevant plan or strategy; national policy statements; and any other relevant national policy required or issued under legislation.[4]

9. Auckland Airport does not consider the Council has adequately provided for the relevant policy and planning directions for infrastructure in Auckland, particularly in respect of Auckland Airport. Specifically, Auckland Airport considers the Council has failed to appropriately consider Auckland Airport's planning and existing controls already in place to manage the appropriate growth of the Airport and surrounding development.

Planning for infrastructure – reverse sensitivity

10. The future development of Auckland is a critical issue for New Zealand, and it is appropriate that the Draft FDS looks to appropriately identify the best locations for a growth in business and residential development. However, it is important that essential infrastructure that supports well-functioning urban areas, such as Auckland Airport, is not adversely impacted by new, intensified housing, and that future residents are located in appropriate living environments.

11. Residential development built in proximity to large-scale infrastructure, such as airports, has the potential to give rise to reverse sensitivity effects, which can lead to constraints being placed on that infrastructure. Reverse sensitivity is a well-established concept and an adverse effect for the purposes of the RMA.

12. In the context of Auckland Airport, reverse sensitivity effects can arise when new activities sensitive to aircraft noise[5] ("**ASAN**") are proposed in proximity to the Airport's lawfully established activities (within its designated aircraft noise contours). If not appropriately controlled, this results in large numbers of people being exposed to high levels of aircraft noise, generating annoyance to the effects of aircraft noise. In turn, this has the potential to give rise to complaints about the Airport's operations and submissions on planning processes seeking constraints on the Airport's operations.

13. The nature of aircraft operations means Auckland Airport cannot fully internalise all of its effects within its landholdings. Any increase in development of ASAN around the Airport (both in numbers and density) means more people are receivers to adverse effects of airport

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2 NPS-UD, clause 3.13(1).
3 NPS-UD, clause 3.17.
4 NPS-UD, clause 3.14.
5 ASAN include residential activities, educational activities and healthcare facilities.

activities. Auckland Airport is therefore focused on ensuring that future planning for Auckland appropriately manages the development of ASAN around the Airport. The primary way in which reverse sensitivity is managed for Auckland Airport is through the controls placed on new ASAN under the Aircraft Noise Overlay within the Auckland Unitary Plan ("**AUP**").[6] These place varying layers of restriction depending on the level of aircraft noise – from controls on the density of housing and requirements for acoustic insulation, through to prohibitions on new ASAN establishing. This overlay is an integral part of Auckland's planning framework and impacts the types of activities which can occur within it.

Reverse sensitivity and the FDS

14. Despite the well-established and directive framework for the management of reverse sensitivity and ASAN in the vicinity of Auckland Airport provided by the AUP, proposals frequently arise for residential intensification in the Airport's Aircraft Noise Overlay. The Draft FDS provides an opportunity to reinforce these key directions and better protect the Airport from reverse sensitivity effects while ensuring appropriate living environments for the community. Auckland Airport is concerned the current draft does not utilise that opportunity, and instead undermines the current management of reverse sensitivity in the AUP.

15. While the Draft FDS addresses infrastructure in a variety of ways, the focus is around Council and standard network utility infrastructure (eg stormwater, roading). The Airport is concerned that the Draft FDS is silent in relation to Auckland Airport's infrastructure and the planning approach required to protect it (such as the Aircraft Noise Overlay). This omission is most notable at section 3.2 and Appendix 2 of the draft FDS, which identify a number of AUP overlays but omit any reference to the Aircraft Noise Overlay and the important protections provided by the controls within it. This is particularly concerning given the critical role Auckland Airport will play in helping Auckland achieve the purpose of the Draft FDS.

16. These concerns are reinforced by the Draft FDS promoting a strategy which has potential to significantly increase reverse sensitivity effects on Auckland Airport, for instance encouragement of:

    (a) the extension of mixed-use areas to align with transport corridors[7] including transport projects such as Airport to Botany. The Draft FDS currently suggests such projects present opportunities to support high quality residential growth along transport routes;[8] and

    (b) co-locating residential capacity with employment.[9]

17. Without appropriate recognition of the reverse sensitivity protections already in place under the Aircraft Noise Overlay, the Draft FDS does not provide adequate direction for future planning instruments when considering residential development in specific areas.

18. Most worryingly, the Draft FDS specifically identifies three areas (Manukau, Māngere and Oruarangi) for focused future development which fall partly within the Aircraft Noise Overlays (and in particular the High Aircraft and Moderate Aircraft Noise areas ("**HANA**" and "**MANA**" respectively) which impose controls prohibiting or limiting residential intensification), without any reference to the Airport, including the Noise Overlay and impacts of reverse sensitivity.

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6 AUP, Chapter D24.
7 Draft FDS, page 47.
8 Draft FDS, Appendix 9, page 51.
9 Draft FDS, page 47.

The identification of these areas, in line with the matters noted at paragraph 16 above, results in the Draft FDS encouraging business **and** residential growth in the Manukau, Māngere and Oruarangi areas.

19. This does not align with the supporting evidence behind the Draft FDS which specifically identifies that the Manukau node is to be focused on significant employment and business growth, and not residential growth.[10] The proposed approach also does not align with that adopted in the AUP (even as amended by Plan Change 78) which discourages and in some areas prohibits residential development in the HANA, MANA and industrial zones that fall within those development areas. By conflating encouragement for business and residential growth in these areas, the Draft FDS fails to have regard to the supporting evidence documents and existing AUP controls.

Relief Sought

20. The Aircraft Noise Overlay must be acknowledged within the Draft FDS as a relevant factor for development. The Aircraft Noise Overlays must be added to the identified constraints table within the supporting evidence documents to the Draft FDS,[11] and associated amendments made throughout the Draft FDS to reflect the Overlays as a constraint.

Development Areas within the HANA and MANA

21. The Draft FDS identifies three development areas which are located within the Aircraft Noise Overlay to varying extents. These areas and their location in relation to the aircraft noise contours are depicted at **Annexure A** and discussed further below.

Manukau node

22. The Draft FDS identifies three urban "nodes" where significant growth and investment are needed.[12] It is suggested that these identified nodes will engage with medium density housing,[13] and will bring together housing and employment.[14] Manukau, as depicted in **Annexure A**, is one of those identified nodes. The majority of the Manukau node is zoned as Light or Heavy Industrial Zones (the purple shading in the underlying zoning).

23. Auckland Airport is not opposed to the identification of Manukau (inclusive of the Auckland Airport Precinct) as a focus for future development, provided the focus within the HANA and MANA remains appropriately targeted to commercial and industrial development and not residential development. However, at present the Draft FDS indicates the node, including the areas within the noise contours, is expected to undergo a significant amount of business **and** housing growth over the next 30 years.[15]

24. It is entirely inappropriate for these areas to be the focus of increased housing development for Auckland. The Draft FDS must clarify that the large majority of the Manukau node remains a focus for commercial, industrial and infrastructure growth (and the employment opportunities that come with it) and not co-located residential growth.

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10 Auckland Council *Overall evidence report – for consultation* (Auckland Council, 2023) at 70.
11 Auckland Council Overall evidence report – for consultation (Auckland Council, 2023) at 139.
12 Draft FDS, page 47.
13 Draft FDS, Appendix 9, page 22.
14 Draft FDS, page 32.
15 Draft FDS, page 35.

25. Failure to do so will make the Draft FDS inconsistent with the AUP, including as proposed to be amended by Plan Change 78. This risks encouraging unrealistic development expectations in the area, or directing future plan changes to undo the protections which have been in place for the past several decades.

Relief sought

26. Those sections of the Draft FDS which set out direction for the Manukau node must be amended to reflect the focus of development being on business and commercial development. These amendments must also explicitly note the constraints on residential intensification within the HANA and MANA.

Māngere / Oruarangi development areas

27. The Draft FDS identifies two other areas close to Auckland Airport which could raise similar issues if not appropriately addressed in the Draft FDS – specifically "Oruarangi 2" and Māngere. The location of these sites in the context of the noise contours is depicted at **Annexure A**.

28. Oruarangi 2 is noted as a future urban area which is recommended for further investigation as to its development potential. The Draft FDS outlines that although a Special Housing Area was approved for Oruarangi (also known as Ihumātao), its implementation is dependent on how it responds to the aspirations of iwi.[16]

29. Māngere is also identified as an area for future investment.[17] Māngere is located directly north of Auckland Airport. The Draft FDS acknowledges that there is a potential for large scale redevelopment of the area[18] and that there is expected to be significant residential growth in the area.[19] Māngere has already witnessed redevelopment with the increase in multi-units being built on single sites.[20] Māngere is also being prioritised for development as part of the Kainga Ora's Auckland Housing Programme.[21]

30. Those areas of Oruarangi 2 and Māngere within the HANA and MANA should remain outside of the scope of residential intensification beyond that provided for currently in the AUP for the reasons already explained.

Relief sought

31. Those sections of the Draft FDS which set out direction for the Oruarangi and Māngere must explicitly note the constraints on residential intensification posed by the HANA and MANA.

Ensuring appropriate integration and investment in transport infrastructure

32. The Draft FDS proposes infrastructure development and investment should be coordinated across agencies to maximise collective investment and get the best outcomes.[22] The Draft FDS proposes for a regional and "whole of society view" of the costs and benefits when

16 Draft FDS, Appendix 7, page 35.
17 Draft FDS, 53.
18 Draft FDS, Appendix 10, page 53.
19 Draft FDS, Appendix 5, page 22.
20 Draft FDS, page 35.
21 Draft FDS, page 51.
22 Draft FDS, page 20.

making long-term decisions in respect of development and associated infrastructure, including transport and roading.[23] The Airport to Botany Rapid Transit and Auckland Light Rail are identified in particular as key projects for the coordination of development in that they enable people travelling to and from Auckland Airport, and to the employment opportunities the commercial area at the Airport Precinct provides.[24]

33. Auckland Airport supports the intent of this coordinated approach to infrastructure development, including public transport to provide better connections to the Airport and surrounding areas. However, the Draft FDS and its development has failed to engage with key aspects of Auckland Airport's activities as a critical infrastructure provider in respect of both air and road transport networks. The Draft FDS only refers to Auckland Transport, Waka Kotahi and KiwiRail when referring to those infrastructure providers responsible for delivering future transport projects for the region.[25] This gap is reflected in the evidence reports supporting the Draft FDS, which highlight that the transport evidence utilised for the Draft FDS was developed in collaboration with Waka Kotahi and Auckland Transport.

34. This omits the importance of Auckland Airport as a critical link for the region in respect of regional and international travel, as well as its role as road controlling authority over the 1600ha of land captured within the Airport Precinct – a crucial section of Auckland's roading network. Without explicit and engaged consideration of Auckland Airport's role in the region's transport networks, the Draft FDS fails to meet its development and investment goals. Extending a coordinated development and investment approach to Auckland Airport and its supporting infrastructure networks is fundamental to the ongoing planned development of Auckland and must be reflected in the Draft FDS.

Next steps

35. Significant amendments are required to the Draft FDS to address the above concerns. Auckland Airport is concerned the document will be fundamentally flawed, and out of sync with the planning which has occurred to date for the region without these changes. Auckland Airport requests to urgently meet with Council to speak to this submission, and engage directly on updates to the Draft FDS to address its concerns.

Dated: 31 July 2023

Contact: Auckland International Airport Ltd

[redacted]

[redacted]

23 Draft FDS, page 19.
24 Draft FDS, Appendix 3, page 11.
25 Draft FDS, Appendix 3.

#8179

Aircraft Noise Contours - Unitary Plan

- ANNA
- HANA
- MANA
- Areas of Interest

Zones

- Residential - Large Lot Zone
- Residential - Rural and Coastal Settlement Zone
- Residential - Single House Zone
- Residential - Mixed Housing Suburban Zone
- Residential - Mixed Housing Urban Zone
- Residential -Terrace Housing and Apartment Buildings Zone
- Open Space - Conservation Zone
- Open Space - Informal Recreation Zone
- Open Space - Sport and Active Recreation Zone
- Open Space - Civic Spaces Zone
- Open Space - Community Zone
- Business - City Centre Zone
- Business - Metropolitan Centre Zone
- Business - Town Centre Zone
- Business - Local Centre Zone
- Business - Neighbourhood Centre Zone
- Business - Mixed Use Zone
- Business - General Business Zone
- Business - Business Park Zone
- Business - Heavy Industry Zone
- Business - Light Industry Zone
- Future Urban Zone
- Green Infrastructure Corridor (Operative in some Special Housing Areas)
- Rural - Rural Production Zone
- Rural - Mixed Rural Zone
- Rural - Rural Coastal Zone
- Rural - Rural Conservation Zone
- Rural - Countryside Living Zone
- Rural - Waitakere Foothills Zone
- Rural - Waitakere Ranges Zone
- Strategic Transport Corridor Zone
- Special Purpose Zone
- Coastal - General Coastal Marine Zone [rcp]
- Coastal - Marina Zone [rcp/dp]
- Coastal - Mooring Zone [rcp]
- Coastal - Minor Port Zone [rcp/dp]
- Coastal - Ferry Terminal Zone [rcp/dp]
- Coastal - Defence Zone [rcp]
- Coastal - Coastal Transition Zone
- Water [i]
- Hauraki Gulf Islands
- Road [i]

Mängere

Oruarangi

Manukau

Auckland Airport

Annexure A – Draft FDS Development Areas in the context of the AUP Zoning and Aircraft Noise Overlay

File: U:\01_Incoming\02_Requests\05_CurrentRequestFolders\20230728_NoiseContoursforAC_MarkL\02_Processing\02_Processing\02_Processing.aprx Author: ChristinaHa

Date:31/07/2023

Future Development Plan 2023 #8181

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Tell us why
Refer to the attached letter

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Agree

Tell us why
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Resilient infrastructure

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why
Whenuapai South is well placed for resilient infrastructure - refer to the attached letter

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Refer to the attached letter

HARRISON GRIERSON

31/07/2023

Auckland Council

Dear Auckland Council,

Subject: Future Development Strategy

Introduction

On behalf of Austino, this letter provides feedback on the Draft Future Development Strategy.

Austino Property Group are the owners of the properties at [redacted]. These properties are highlighted as Precincts 1 and 2 in the map below. Under the Future Urban Land Supply Strategy, this land was part of the Whenuapai Stage 1 development which was proposed to be developed between 2018-2022 (with this block identified as Whenuapai South in the FDS as shown below).

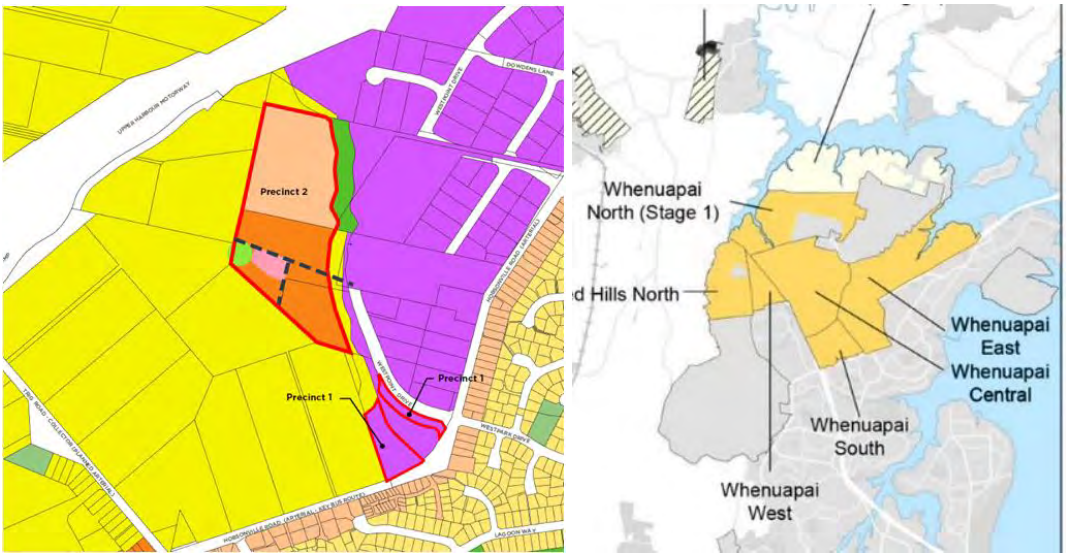


Figure 1: Land owned by Austino Property Group Labelled Precinct 1 and 2 (left) and Extract from FDS (right)

The Proposed Future Development Strategy (FDS) has since pushed the development of Whenuapai South out to 2035 (along with the area to the north of SH18 referred to as Whenuapai North and Whenuapai Central, East and West). The reasons cited are the timing of future infrastructure and transport investment for the area. It is our opinion that development in the Whenuapai South area would achieve Auckland Council's goal of creating sustainable neighbourhoods that contribute to the multi-nodal approach and that there is no requirement to delay the timing of this proceeding.

Austino request that Auckland Council review the information provided in this feedback and then amends the final version of the FDS to reflect the findings that the Whenuapai South block is development ready and therefore the timing delay can be removed (or be amended to the first timing category of 2025+).

Background

The following notes provide further information that is relevant to the consideration for future development of Whenuapai South.

Strategic Documents

Auckland's northwest has been identified for future urban growth since the late-1990s/early-2000s and a number of strategic documents from the last two decades help inform the council's current plans and strategies for urban growth in the northwest.

The Auckland Regional Growth Strategy 1999 identified the area immediately south of Whenuapai and land along Hobsonville Road and at Westgate as future growth areas. The shortage of business land in the west was acknowledged in that document and in the 2001 Northern and Western Sectors Agreement which was signed by the former North Shore City, Waitakere City and Rodney District Councils. It identified the Brigham Creek/Waiarohia area as an existing rural area with capacity for growth. In 2010, the former Waitakere City Council published the 'Best for the West – Growth Management Strategy for Waitakere'. That strategy suggested staged new urban development at Redhills, Trig Road and Whenuapai and prioritised structure planning for the Whenuapai Business Area and Hobsonville Corridor West. The structure planning exercise undertaken by the council in 2016 generally aligned with the approach of this strategy.
A concept plan for the area was prepared in 2010. The plan included land at Redhills, Westgate, Whenuapai North, the triangle south of Brigham Creek Road between State Highway 16 and State Highway18, Hobsonville Corridor West, Hobsonville Corridor, Hobsonville Point and Scott Point. Land between State Highway 16, State Highway 18 and Brigham Creek Road was identified as business land. It also identified Hobsonville Corridor West (Trig Road area, south of SH18) as development ready in 2020 and Whenuapai North as scheduled for development after 2030.

Subsequent council documents including the Auckland Plan (2012), AUP (OP), Future Urban Land Supply Strategy (2015), the Whenuapai Structure Plan (2016) and the updated Section 32 report for notification of the Proposed Whenuapai Plan Change 21 September 2017 Future Urban Land Supply Strategy (2017) all identify Whenuapai as a future urban growth area. The Future Urban Land Supply Strategy, adopted by the council in July 2017, identified Whenuapai Stage 1 as 'development ready' in 2018-2022 and Whenuapai Stage 2 ready in 2028-2032. Stage 1 in the Future Urban Land Supply Strategy is the same area as Whenuapai South. This staging and ability for the Whenuapai South area to be development ready sooner than the northern area is something that the FDS has not recognised.

Auckland Unitary Plan Proposed Plan Change 5 - Whenuapai - Auckland Unitary Plan (operative in part)

Auckland Council has withdrawn the above proposed plan change to the Auckland Unitary Plan (Operative in Part) under Schedule 1 (clause 8D) of the Resource Management Act 1991 (RMA). The reasons given for this withdrawal are that: i) there is no funding budgeted in the lifetime of the Auckland Unitary Plan (ten years) for the upgrading of the wider transport networks to address the anticipated adverse effects from increased traffic generated by the development of land in Proposed Plan Change 5 ii) progressing Proposed Plan Change 5 (and any variation) through to a decision by independent hearing commissioners will not provide sound resource management outcomes in terms of managing adverse effects on the wider transport network iii) progressing Plan Change 5 will not result in the rezoning of land within the Rural Urban Boundary that is integrated with the provision of infrastructure iv) progressing Plan Change 5 creates a risk of the council having to provide infrastructure that is currently unfunded, or having to divert funding from other locations for which funding is required and exists.

Plan Change 5 included a far larger area than the Whenuapai South block. When this block is considered in isolation it is adjacent to Light Industrial land recently or currently under construction with new roading connections (Westpoint Drive and Marina View Drive) being completed by developers with access options for the block.

Road Upgrades

In the FDS, the site is within the Westgate Node and is on the edge of the existing north-west urban area. Auckland Transport have already proposed several upgrades to the region including upgrades to Hobsonville Road, Trig Road South and the North-west Whenuapai assessment package with the Trig Road south project already underway.

This Trig Road (south) upgrade involves retaining two general traffic lanes but upgrading the corridor to an urban standard, with provision for active mode facilities. This includes the intersection with Hobsonville Road, which will be retained as a T intersection with signals.

The upgrades being carried out by developers at 96, 98 and 100 Hobsonville Road (this last site being Austino) mean that part of Marina View Drive is completed. The connection of Marina View Drive to the Spedding Road upgrade over SH18 is part of the future roading projects (set out in Auckland Transport's recent Notice of Requirements) and therefore this developer funded completion of part of this road connection again make the Whenuapai South transport connections more current than the FDS states.

The total North-west Whenuapai upgrade package is shown in Appendix 1 below. The immediate live zoning of the Whenuapai South area would allow development to be integrated with the timing of the upgrades to Trig Road. This would support the efficient use of future urban areas.

Infrastructure

Watercare have been progressing with the Northern interceptor (Running parallel to the motorway) which will provide additional wastewater servicing and is due to be completed (Live) 2025-2026. Water supply is available in Hobsonville Road. Stormwater management is part of the wider consideration of the local streams network (as discussed in the *Hazards* below).

As the Whenuapai South block is surrounded by the existing urban area, there are existing service options for other utilities (Chorus/Vector).

Trig Road School

The development of Trig Road School is underway at 13-15 Trig Road.

The purpose of this school (provided in the designation details from 2021) is to provide both primary school (years 0 to 8) and Early Childhood Eduction (preschool) facilities.

Initially this school is identified as providing overflow services to serve a temporary shortfall in the school network capacity in Whenuapai North and Redhills. In Phase 2, the school and early childhood centre is proposed to serve the long-term needs of the local adjacent school catchment (emphasis added).

which would service any dwellings that are developed within Whenuapai South. This is shown in figure 2 below.

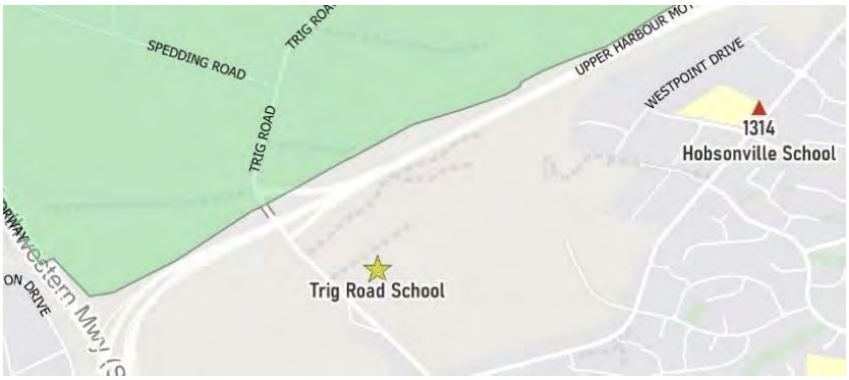


Figure 2: Trig Road School Location

Residential Amenities

As Whunuapai South sits within an established urban area there are a number of community and recreational facilities nearby including: the Westgate Baptist Church (67 Hobsonville Rd – providing religious facilities and early childhood care), Hilda Griffin Reserve (opposite the intersection of Trig Road and Hobsonville Road) providing a largely vegetated open space with pedestrian thoroughfare to surrounding residential streets and to Louise Place Reserve, Hobsonville War Memorial Park, Headstart Childcare at 193 Hobsonville Rd, Hobsonville School (104A Hobsonville Rd), Hobsonville Road Retired Services Association (114 Hobsonville Rd), Upper Harbour Medical Centre (393 Hobsonville Rd), Hobsonville Public Hall (397 Hobsonville Rd).

A number of facilities are also in close proximity to the Hobsonville Road corridor, including: Te Piri Ngātahi o te Maungaarongo Marae (Luckens Road), affiliated with Ngapuhi and situated approximately 100 m south of Hobsonville Road, Hobsonville Bowling Club (1 Memorial Park Lane) situated to the north of Hobsonville War Memorial Park, various childcare centres and kindergartens in close proximity to Hobsonville Road along the length of the corridor, other café/ restaurant options within the adjacent business area.

The area is also well serviced by the Westgate shopping centre and development at Whenuapai South would contribute to a compact neighbourhood and sustainable development by reducing the amount of vehicle

kilometres travelled. The development of Whenuapai south would therefore help Auckland Council achieve its goal of reducing emissions through bringing residents closer to their places of work, shopping, and schooling.

In addition, the Council has recently carried out the Rawhiri Stream Renovation project providing an enhanced stream environment with walking/cycling tracks and seating/play/ viewing platform features throughout. This provides a recreational amenity for persons at neighbouring business and residential sites.

Developer Contributions

As noted above, developers carry out much of the infrastructure requirements as part of their developments (as demonstrated in the Light Industrial block to the east of Whenuapai South where Austino constructed a section of collector road and a fully signalised intersection with Hobsonville Road when their development was only for 10 industrial lots).

The FDS does not recognise that most growth-related infrastructure is funded directly by developers reducing the requirement for public funds. This private investment would allow for the integrated development of the Whenuapai South area through implementing the servicing required for over 7,000 dwellings.

Hazards

Not surprisingly given several years of drought followed by the extreme flooding events of the past year, there is a greater emphasis on resilience to climate change and natural hazards in the FDS. As shown in Figure 3, development within Whenuapai South would achieve Auckland Council's goal of reducing development in flood prone and sensitive areas. Comprehensive structure plans for Whenuapai south would tie in with the catchment-based approach that has been successful for recent developments in the live zoned land to the east.

The Whenuapai Structure Plan identifies the Totara Creek and Trig / Rawiri / Waiarohia Stream fork as esplanade reserve, and these features are therefore likely to be retained and enhanced. Anticipated urban development is expected to increase surface water runoff by increasing impervious surfaces, however provided development addresses its flooding effects, it is not expected to increase the natural hazard conditions significantly in the future.

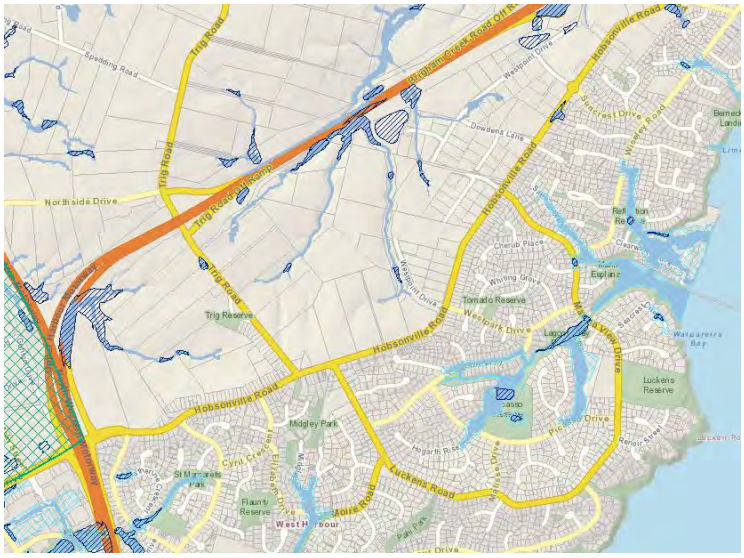


Figure 3: Hazards within the Whenuapai South Area

Economic Growth

Finally, in our view, enabling development in Whenuapai South at an earlier time will provide an opportunity for a well-planned mixed-use area. Land north-east of the Austino blocks are zoned industrial and development is already occurring in this area. Further development in Whenuapai South would continue to support business development and economic growth in the area. With additional supported residential growth, this will bring residents and work closer together and provide further business opportunities in the Westgate Node.

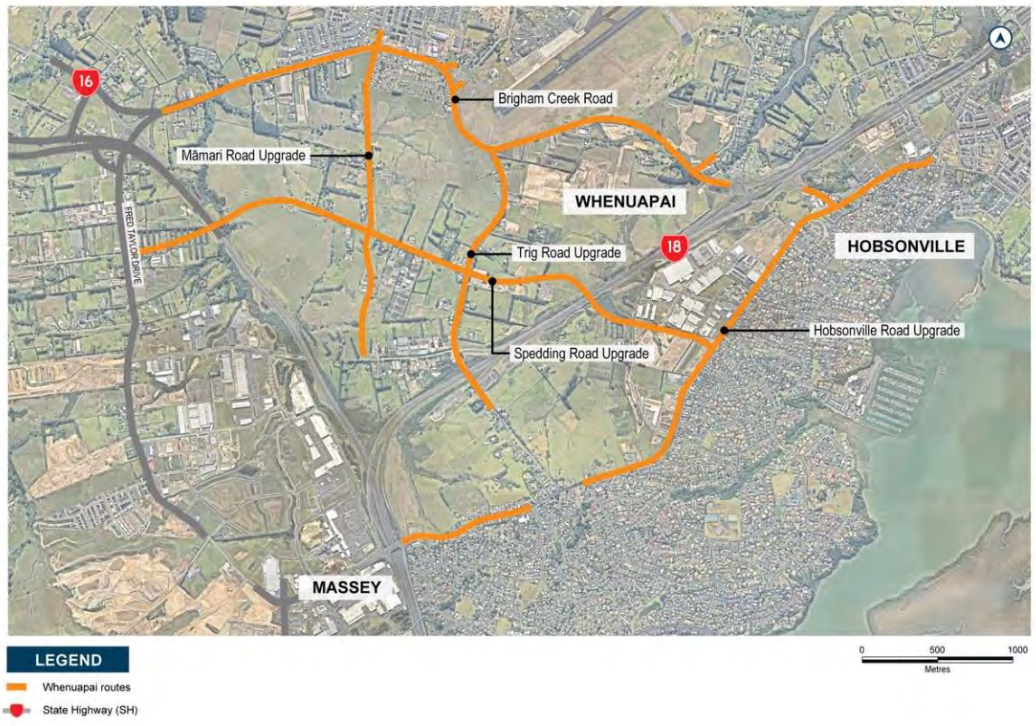
We would appreciate the opportunity to discuss this further with Auckland Council or look forward to an amended FDS with no (or a reduced) time delay on the live zoning of Whenuapai South.

Regards,

[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
harrisongrierson.com



Appendix 1: North-West Whenuapai Assessment Package



Future Development Plan 2023 #8187

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

The majority of Auckland's growth should be in existing urban areas but a blanket ban of greenfield developments is not right. Changes in the FDS need to be consulted properly with mana whenua also. Please see submissions discussed further below.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

The majority of Auckland's development should be near local centres but a blanket ban of greenfield developments is not right. Changes in the FDS need to be consulted properly with mana whenua also. Please see submissions discussed further below.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

Future developments cannot be bailed out by the council and government. Developments need to outline how they will deal appropriately with environmental hazards. A blanket ban on all developments is not right. Changes in the FDS need to be consulted properly with mana whenua also. Please see submissions discussed further below.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why

In general, this makes sense. A blanket ban on all developments is not right. Changes in the FDS need to be consulted properly with mana whenua also. Please see submissions discussed further below.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Te Kawerau a Maki are part of Waiohua Tāmaki and we have a number of development plans that we are working separate to other iwi. We also have some developments with Avant. Therefore, we support the submissions provided by Waiohua Tāmaki and Avant which oppose the FDS in its current form.

Furthermore, we wish to express that insufficient consultation with us, as Mana Whenua, has occurred regarding the proposed FDS. The treatment of iwi land and land returned to iwi via the treaty process or our partnership with government, government agencies (including Council and CCO's) requires special consultation with mana whenua iwi and special consideration when it comes to iwi development. Iwi are kaitiaki and do not want to build in flood plains and on unstable land. Iwi care about culture, history and the environment. It is at the forefront of all decisions. However, this FDS in its current form, is going against treaty expectations and obligations that government and the council should be adhering to.

Future Development Plan 2023 #8188

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Your feedback

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1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

Please refer to attached document

Accessible local centres

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We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

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Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

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Other

Tell us why

Please refer to attached document

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Please refer to attached document

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please refer to attached document

#8188

Te Kāhui Whaihanga
Auckland Branch

This is a submission on the Auckland Future Development Strategy 2023-2053 Draft on behalf of the Auckland Branch Committee of Te Kāhui Whaihanga New Zealand Institute of Architects and reflects the views of the Committee.

Quality compact growth in existing urban areas in Tāmaki Makaurau is critical to ensuring a well-functioning urban environment for future generations to live, work, play and visit this city.

We support the general aims of the strategy and have the following comments.

To achieve the desired spatial outcomes identified in the Future Development Strategy Strategic Spatial Framework, a rigorous process of public engagement and consultation with all stakeholders needs to occur. To enable the transformation outlined in the dynamic and changing environment we live in, an implementation plan and ongoing review process will also be required.

- **Blue/green spatial network:**

Comprehensive plans for Future Urban Zones (prior to zoning) and intensive growth areas are required to manage the combined needs of ecology, hydrology, infrastructure, economics, community and urban growth across the city and ensure climate resilience and the health and wellbeing of the community through greater understanding and management of our Taonga, natural systems including natural hazards.

- **Integrated spatial planning at a local level:**

Undertake local neighbourhood master plans which are place-specific and involve the community as integral stakeholders within this process to provide developers, residents and business owners certainty as to where growth is expected and when it is to occur based on investment and rollout of infrastructure. This master planning process must identify how the desired outcomes will address place-specific community needs of housing, services, education, employment, transportation etc in a manner which is specific to the people, place and immediate context of each local area.

- **Growth to be predominantly in existing areas:**

Quality compact growth to be contained within the existing urban extents of Tāmaki Makaurau

We support the concept of quality compact form, but stress that there must be mechanisms in place to both define what is meant by ‘quality’ and how it will be implemented. It is critical that Auckland Council clearly outline the assessment criteria and measurement processes to ensure high quality outcomes are achieved and adhered to across all scales of future urban development, including but not exclusive to housing, mixed use developments, built form, transport outcomes, public realm and integration of community amenity and recreational spaces.

Limiting private plan changes for land holdings which do not support the principles of a well-functioning urban environment.

- **Equitable Distribution of Future Development and Outcomes:**

Provisions for more equitable distribution of housing and housing choice with consideration of affordability, a community's access to employment, transportation options, goods, services, recreational and cultural resources, in particular, access to community facilities and green space and ways that allow people to live and work locally while providing resilience to climate change.

- **A well-functioning mass transport system which is integrated and aligned with localised neighbourhood spatial / master planning:**

Particular focus and care are required around zones identified as key rapid transit corridors as these are areas where greater density in the future built form is encouraged to occur. Integration of development outcomes are critical to the success and utilisation of this key rapid transport infrastructure.

- **Resilient Infrastructure Development**

Develop resilient infrastructure which addresses the ongoing impacts of climate change.

Align infrastructure development with spatial planning and address funding mechanisms to provide certainty around infrastructure timing and outcomes with a confirmed and funded pipeline of infrastructure work to provide confidence in developments and stimulation of both public and private investment. The formation of an independent urban development authority should be investigated with a mandate to lead and invest in transformational projects.

The Infrastructure Commission needs to be given the mandate to prioritise the infrastructure pipeline independently of political cycles to ensure that Tāmaki Makaurau gets the supporting resilient infrastructure it needs to grow and develop sustainably. This would avoid policy swings which occur with government changes that cause uncertainty in the construction industry, diminishing productivity and hampering sustainable growth.

- **A City Architect:**

We support/encourage the introduction of a City Architect with the remit and strategic guidance oversight to ensure that the quality outcomes encouraged by the Future Urban Development Strategy are delivered successfully. A city architect would contribute to the long-term vision, functionality and character of Tāmaki Makaurau ensuring that growth and development can occur in a harmonious and sustainable manner. We see this role similar to the State Architect Role established in Australia which enables and ensures processes are in place to educate and promote quality outcomes in the built environment commissioning research, proposals and sponsoring placemaking design competitions where the public good would benefit from such initiatives encompassing public space planning, preservation and conservation, design review and urban planning.

31 July 2023

Auckland Branch Committee
Te Kāhui Whaihanga New Zealand Institute of
auckland@nzia.co.nz

Future Development Plan 2023 #8194

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please see the attached submission from Property Council New Zealand

#8194

Property Council New Zealand

Submission on

Draft Auckland Council Future Development Strategy

31/07/2023

For more information and further queries, please contact
[redacted]

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Corporate Sponsors

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31 July 2023
Auckland Council
Auckland 1142
Email: futuredevelopmentstrategy@aucklandcouncil.govt.nz

Draft Auckland Council Future Development Strategy

1. Summary

1.1 Property Council New Zealand Auckland Committee ("Property Council") welcomes the opportunity to provide feedback on Auckland Council's draft Future Development Strategy. It is critical to have a robust vision for the future of Auckland, that addresses our cities current challenges around housing supply and affordability while also giving the property sector the confidence to make long-term investment decisions.

1.2 Property Council supports a balanced approach to enabling Auckland's future urban growth. While Property Council welcomes aspects of the Future Development Strategy, such as Auckland Council's intent to support greater urban intensification, we are deeply concerned about many other parts of the draft Future Development Strategy, which seeks to reverse Auckland Unitary Plan decision-making through the proposed restrictions and delays to new greenfield development. This erodes confidence in Council's ability to plan long-term.

1.3 Property Council also has broad procedural concerns about the manner in which the Future Development Strategy was developed. We have been disappointed with the quality of consultation and engagement to date. We are further concerned about the draft Future Development Strategies alignment with central government's National Policy Statement on Urban Development ("NPS-UD") as it fails to provide sufficient development capacity due to the flawed methodology in trying to capture this information.

1.4 In our view, there is a clear need to revise the draft Future Development Strategy. We strongly recommend that Auckland Council pause passage of the Future Development Strategy, in order to re-engage with the property sector and develop a revised Future Development Strategy that better meets Auckland's future needs.

1.5 This document provides Property Councils feedback on Auckland Council's draft Future Development Strategy. Comments and recommendations are provided on issues relevant to Property Council's members.

2. Recommendations

2.1 At a high level, we recommend that Auckland Council:

- Pause the draft Future Development Strategy and instead develop a revised approach;

2.2 In broad terms, a revised Future Development Strategy should:

- Include housing affordability as a policy objective;
- Work with the property sector to establish improved and more accurate development capacity and geographic modelling;
- Urgently reconsider their proposed approach to restricting or delaying greenfield development;

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- At minimum continue the greenfield development strategy already established in the Auckland Unitary Plan;
- Reconsider the proposed use of infrastructure triggers and adopt a more flexible approach providing to infrastructure for greenfield developments;
- Use the Infrastructure Funding and Financing Act to fund and finance infrastructure to support new development.

3. Introduction

3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive".

3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.

3.3. Property is Auckland's largest industry. Property provides a direct contribution to Auckland's GDP of $12 billion (12 percent) and employment for 71,940 Auckland residents.

3.4. Property Council is the collective voice of the property industry. We connect property professionals and represent the interests of 351 Auckland based member companies across the private, public and charitable sectors.

4. Procedural flaws with the draft Future Development Strategy

Alignment with NPS-UD

4.1. Auckland Council is legally required by the NPS-UD to develop a Future Development Strategy for Auckland. Section 3.13(1) of the NPS-UD states that:

> "(1) The purpose of an FDS is:
>
> a) to promote long-term strategic planning by setting out how a local authority intends to:
>
> (i) achieve well-functioning urban environments in its existing and future urban areas; and
>
> (ii) **provide at least sufficient development capacity**, as required by clauses 3.2 and 3.3, **over the next 30 years to meet expected demand**; and
>
> b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions."

4.2. Property Council is deeply concerned that the current approach taken by Auckland Council fails to meet the NPS-UD requirement to provide "sufficient development capacity". For example, we are concerned that the development capacity modelling is not based on feasible developments. We are further concerned that the population growth projection of an additional 520,800 people over 30-years potentially undercooks likely population growth, given continued strong net annual migration of 72,300 in the April 2022 to April 2023 year[1]. Pre Covid

[1]https://www.stats.govt.nz/information-releases/international-migration-april-2023/#:~:text=ended%20September%202022-,Annual%20migration,of%2019%2C300%20(%C2%B1%20100).

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Stats NZ figures suggest that 61 per cent of migrants choose to settle in Auckland[2]. Assuming this trend continues post Covid, we could easily hit the Future Development Strategies 30-year population in just under 12 years.

Consultation and engagement

4.3. The NPS-UD sets out specific consultation and engagement requirements for Auckland Council to follow when developing the Future Development Strategy. Examples include the requirements under clause 3.15(1) of the NPS-UD, to "use the special consultative procedure in section 83 of the Local Government Act 2002" and the requirement under clause 3.15 (2)(f) to engage with "the development sector (to identify significant future development opportunities and infrastructure requirements)".

4.4. Property Council has been deeply disappointed with the quality of consultation and engagement to date on the Future Development Strategy. We have previously expressed some of our concerns in a letter to Auckland Council's Manager Growth & Spatial Strategy dated 29 March 2023 – see appendix one. Property Council did not receive a response to this letter.

4.5. As part of Auckland Council's engagement with the development community, the draft Future Development Strategy reports two actions; a survey sent to property developers and a presentation of results to Property Council's Auckland Committee members. We do not agree that a presentation of results should be deemed as viable consultation. Neither of these were satisfactory as the proposal saw deep methodology flaws, such as the "one click" technique which required developers to click on a map of Auckland where they were planning on developing. The one click method could be a development of one house or 1,000 houses – thus entering into guessing game territory. Furthermore, as expressed in our previous letter, we are concerned that the sample size and methodology of the developer survey are not representative of the property sector nor accurately reflect where future development will occur.

4.6. Property Council ran a survey of our Auckland membership and found that 93% of our Auckland based members, who have a current resource consent with Auckland Council (or have had one within the last 6 months) were not contacted to take part in the survey. Our own survey had a sample of 74 member responses. Of which 46 members were developing in the next 10 years, there were 9 projects worth $9 million or less, 11 projects worth between $10-49 million, 8 projects worth between $50-99 million, 7 projects worth between $100-499 million and 11 projects worth more than $500 million.

4.7. These developments are across a wide range of typologies, namely Civic, Commercial, Education, Healthcare, Industrial, Residential (private), Residential (social) and Retail. As such, we strongly suggest that Auckland Council has not forecasted a significant amount of planned future development, especially in non-residential sectors.

Development Capacity Modelling

4.8. Property Council is concerned that the draft Future Development Strategy is premised on flawed development capacity modelling. As currently drafted, it states that there are 2,345,500

[2]https://web.archive.org/web/20170906135112/http://www.stats.govt.nz/~/media/Statistics/Browse%20for%20stats/IntTravelAndMigration/HOTPJun17/itm-jun17-tables.xls

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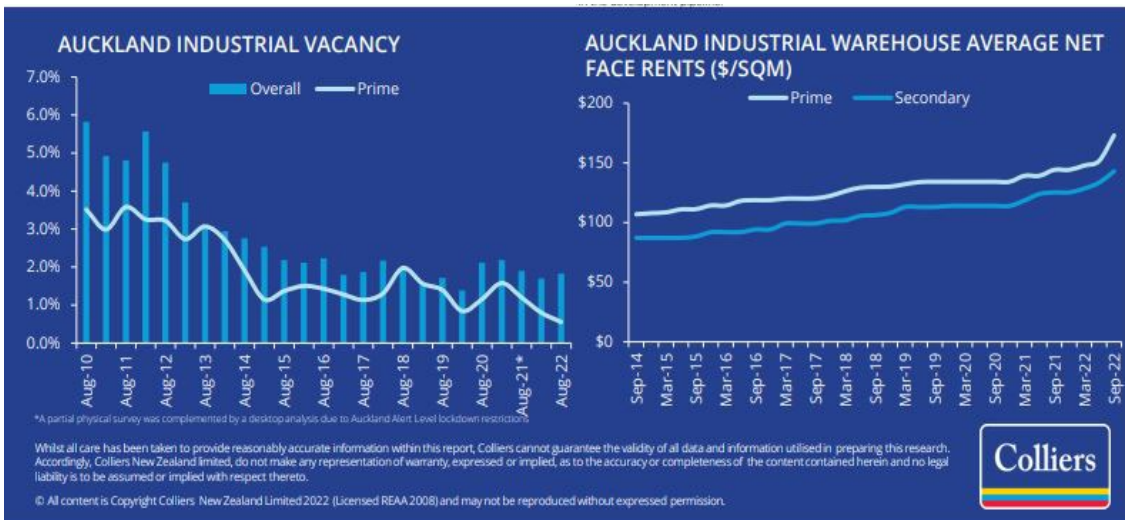
enabled residential dwellings in Auckland and concludes that Auckland has sufficient business and industrial land capacity. In our view, neither of these assumptions are correct.

4.9. Property Council foresees a number of issues with the residential development capacity modelling. To begin with, the 2,345,500 figure in the Future Development Strategy is not based on developments that are feasible or "ready to build". Instead, the residential development capacity modelling is based on "plan enabled" capacity, which is reliant on Plan Change 78. Given that Plan Change 78 is currently non-operative and likely to be subject to significant upcoming revisions, we consider the current modelling to be inaccurate.

4.10. Furthermore, this reliance on plan enabled capacity as opposed to feasible capacity means that in practice, many of the 2,345,500 dwellings referred to in the Future Development Strategy are not economically viable to develop or may not yet have the supporting infrastructure to enable development. Additionally, many sites across Auckland will be on cross-lease, unit title, leasehold land or have other restrictive covenants that will further restrict a developer's ability to intensify.

4.11. Property Council also disagrees with Auckland Council's assumption in the Future Development Strategy that Auckland has "at least sufficient plan-enabled business capacity". In fact, the supply of business and industrial land in Auckland is constrained. This can be seen reflected in the large scale price inflation in industrial rent prices in recent years, and the extremely low vacancy rates for industrial across the Auckland region. Data from Colliers New Zealand, shown in *Table 1* below, highlights that Auckland industrial vacancy rates are notably decreasing and thus with less supply, rents are increasing. Furthermore, Barfoot & Thompson's August 2023 Commercial Insite publication[3] states that "The real upward pressure on rentals has been within the industrial sector. New build industrial rentals are exceeding $200/m2 across the board and vacancy rates remain at all time lows. The simple reality is that Auckland does not have the necessary availability of industrial land. This is unlikely to change".

Table 1: Colliers New Zealand data



4.12. Furthermore, Auckland Council's modelling on plan-enabled business capacity is contingent on a high level of business intensification, that for many business activities may not be practical or

[3] https://view.publitas.com/barfoot-thompson/commercial-insite-august-2023/page/1

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economic. For example, the majority of industrial capacity is classified as second storey or above, highlighting a reliance on multi storey industrial developments with high site coverage. For many industrial land users, this may not be practical to do so. Accordingly, Property Council is deeply worried about the inaccuracy of the draft Future Development Strategy methodology that underpins the business and industrial land modelling.

4.13. It is difficult to successfully plan for urban growth over the next 30-years without accurate development capacity modelling. Accordingly, Property Council recommends that Auckland Council should work with the property sector to develop more accurate development capacity modelling for a re-written Future Development Strategy. We note that the property sector successfully collaborated with Auckland Council with development capacity modelling during the 2016 Unitary Plan process, which our members report worked well. Additional changes that negate the decisions made in the Unitary Plan process will increase uncertainty and stifle or halt development in Auckland.

Omission of Housing Affordability as an objective

4.14. Property Council is extremely worried that housing affordability is not a stated policy objective of the draft Future Development Strategy. Recent reports suggest that Auckland is the world's seventh most unaffordable housing market[4], with house prices sitting at 10.8 times the median household income. Increasing the supply of both infill and greenfield development would help alleviate current housing pressures of Auckland residents.

4.15. In our view, not having housing affordability as a policy objective of the Future Development Strategy is a major strategic omission and does not align with the requirement of the NPS-UD to achieve a "well-functioning urban environment" and to provide "sufficient development capacity". It further contradicts Direction 3 of Auckland Council's Auckland Plan, which seeks to shift to a housing system that "ensures secure and affordable homes for all". The Auckland Plan states that "Auckland is experiencing a housing affordability crisis", with one of the key focus areas being to "accelerate quality development at scale that improves housing choices."[5]

4.16. In order to address our deep concern, we strongly recommend that a re-written Future Development Strategy should incorporate housing affordability as a key policy objective. We envisage that there will need to be revisions to the current approach to meeting urban growth, in order to achieve progress on housing affordability. Elements of our preferred approach are outlined in subsequent sections of this submission.

5. Approach to meeting urban growth

5.1. Property Council supports a balanced approach to enabling Auckland's future urban growth and we have long supported cities who look to grow both up and out to meet growth pressures. While Property Council welcomes the intent of Auckland Council to support greater intensification in Auckland, we are deeply worried about the impact of the proposed rollback and delay of greenfield development, as previously planned for in the Auckland Unitary Plan and we are also concerned about the introduction of new infrastructure triggers.

[4]https://www.stuff.co.nz/life-style/homed/real-estate/131564094/new-report-ranks-auckland-seventh-least-affordable-housing-market

[5]https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/Pages/default.aspx

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Urban intensification

5.2. At a principled level, Property Council welcomes Auckland Council's intent to encourage greater urban intensification through the Future Development Strategy. Property Council supports high quality urban intensification, as our members know that it will help Auckland achieve outcomes that meet the city's housing, environmental, social and economic ambitions. However, encouraging urban intensification should not come at the expense of also enabling new greenfield development. Both are required to meet Auckland's current and future population growth as well as housing supply and affordability needs.

5.3. The draft Future Development Strategy references the need for Auckland Council to investigate additional actions to "further enable and incentivise dense, mixed-use development close to optimal centres and rapid transit". This is a proposal that Property Council supports in principle.

5.4. When encouraging urban intensification, it is important that Auckland Council develops a planning and regulatory framework that supports high quality urban design and ensures development feasibility. As discussed in Property Council's submissions on Plan Change 78 and on Plan Change 79, we are worried about Auckland Council implementing overly prescriptive planning regulations that we could see resulting in unintended design outcomes that lower the future quality of Auckland's built environment.

5.5. For example, the proposed new Terraced Housing and Apartment Building zone rules restrict height to a six stories maximum. This height limit could negatively impact development feasibility and along with other rules, will also have unintended consequences on urban design. As a result, Auckland's future skyline within this zone could be one dimensional, and without natural variance. It is important that the rules allow for variation, with greatest height in areas with the greatest accessibility. Greater heights should be encouraged along transport corridors and close to amenities such as Train Stations.

5.6. Another example is the negative impact that Plan Change 79 will have on both development yields and Auckland's natural environment. We opposed the majority of Plan Change 79 provisions, as in our view the proposals will result in loss of amenities through requiring more concrete for onsite loading zones, parking and accessways which will decrease site yields and result in 'wasted space' that could have been used to enhance amenity values such as installing gardens or greenery. There is a clear link between the Future Development Strategy and the aforementioned Plan Changes, as the future planning framework for Auckland will have a major impact on the patterns of development that Auckland experiences.

Greenfield development

5.7. Property Council is deeply concerned about the proposed approach to restricting or delaying greenfield development and introducing infrastructure triggers in the draft Future Development Strategy. In broad terms, we are worried that this will impact housing supply and affordability, as well as further tightening the supply of business and industrial land across Auckland. We have outlined our concerns relating to restricting or delaying greenfield development in more detail below.

Loss of Future Urban Land

5.8. Through the 2016 Auckland Unitary Plan process, Auckland Council had identified around 15,000 hectares of Future Urban Land across Auckland, where greenfield development would

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be enabled. At the time, it was estimated that this land could accommodate approximately 137,000 homes and 67,000 jobs. As of March 2023, around 33 per cent of identified future urban land has now been live zoned. We understand that many of the remaining areas of identified future urban land has been purchased with an intent to develop in the future.

5.9. Auckland Council is now proposing in the draft Future Development Strategy to make significant changes to established areas of future urban land, that will roll-back already planned for developments. Auckland Council is seeking to remove four selected areas of future urban land (Hatfields Beach stage 2, parts of Kumeū-Huapai-Riverhead, Takaanini and parts of Drury-Ōpaheke), investigate the potential removal of additional areas of future urban land and to delay the live-zoning of significant amounts of the remaining areas of future urban land.

5.10. The loss of the aforementioned areas of Future Urban Land, along with the significant market uncertainty of the "under investigation" label, and the delay to live-zoning many of the remaining areas of Future Urban Land, will halt or delay a significant number of much needed new developments across Auckland. At a time when Auckland desperately needs to be increasing our housing supply, particularly of affordable housing, and streamlining development, the draft Future Development Strategy may take us backwards.

Natural hazards and climate change

5.11. Auckland Council argues in the draft Future Development Strategy that by restricting or delaying future urban land, that this will remove areas with natural hazard risk from development, reduce transport emissions, reduce infrastructure cost pressure on Council and support a more compact urban form. Property Council does not agree with this characterisation of greenfield development.

5.12. Property Council firmly believes that a more nuanced approach to greenfield development is needed. In our view, Auckland Council has not accounted for the potential for private infrastructure financing to reduce the cost pressure of new infrastructure, nor the ability for engineering, planning and infrastructure solutions to address many of the natural hazard risks that may be present on existing future urban land.

5.13. Well-planned greenfield development, can mitigate climate change and deliver appropriate housing typologies that may not be able to be delivered within the existing built environment. High quality greenfield developments can also help support Auckland's climate adaptation, by redirecting water flow through infrastructure and incorporating best practice in terms of planning for communities with access to transport linkages and housing closer to future amenities and employment opportunities.

5.14. Property Council members that we surveyed were concerned about the impact that the Future Development Strategy could have on their developments. In a multi-choice question, only 16 per cent of member respondents would continue their developments as planned with the Future Development Strategy. Around 58 per cent of member respondents said that they would have to "re-evaluate the feasibility of development projects". Our survey member respondents report that they would have to scale down some of their projects (18 per cent) or scale down all of their projects (9 per cent). Concerningly, 24 per cent of our member respondents report that they would have to halt some of their projects, with 2 per cent being forced to halt all of their projects.

#8194

Business land

5.15. The roll-back and delay to future urban land across Auckland will also have a harmful and negative effect on Auckland businesses. Planned developments that are at risk of being cancelled on existing future urban land are not only residential, but there is also a significant amount of business and industrial developments in the pipeline. These developments are critical for the economic future of Auckland and will serve as major employment hubs for Auckland residents.

5.16. Property Council does not agree with the modelling in the draft Future Development Strategy that seeks to portray a sufficient business and industrial land capacity. Without continued access to future urban land, we are at risk of losing planned commercial developments. This will not only reduce future employment opportunities for Auckland residents but will also further create incentives for business (especially more land intensive businesses) to leave the Auckland region for other urban centres with greater availability of developable business and industrial land.

Way forward for greenfield development

5.17. In order to address our concerns, Property Council recommends that Auckland Council urgently reconsider their proposed approach to restricting or delaying greenfield development. We recommend that a revised approach should at minimum continue the greenfield development strategy already established in the Auckland Unitary Plan and incorporate principles around housing affordability into the re-written Future Development Strategy. This should be done in collaboration with the development sector to ensure that a revised approach to greenfield development incorporates transport and infrastructure capacity, and the ability for alternative funding and financing to enable new housing supply.

Infrastructure triggers

5.18. Auckland Council is also proposing to introduce new infrastructure trigger requirements which will restrict the development of the remaining areas of future urban land. In practice, these infrastructure triggers will further delay live zoning of future urban land until Auckland Council determines that they are ready to put in place the required infrastructure to support the new development.

5.19. Property Council is concerned that the proposed approach to infrastructure triggers is overly blunt and will have the practical effect of further delaying significant amounts of new development by sequencing delays. It is vital that Auckland Council sequences the establishment of new infrastructure in a manner that gives confidence to the property sector to invest in Auckland.

5.20. We recommend that Auckland Council reconsiders the proposed use of infrastructure triggers and adopts a more flexible approach to infrastructure for greenfield developments in a re-written Future Development Strategy. In our view, a more flexible approach would entail working with the property sector as well as central government to identify opportunities for private provision of key infrastructure to support development where possible.

5.21. We are also worried that the draft Future Development Strategy is largely silent on how capacity upgrades and new infrastructure to support development will be funded and delivered. For

years, Property Council has encouraged local government to investigate alternative funding and financing mechanisms to help better balance council books.

5.22. Central Government has provided the Infrastructure Funding and Financing Act ("IFF") to fund major infrastructure investments. Property Council supports, in principle, the Special Purpose Vehicle ("SPV") funding model as set out in the IFF Act. SPVs makes the cost of new infrastructure more transparent, improve intergenerational equity by spreading the cost over a sustained time period and also unlock additional investment in much needed infrastructure. We recommend Auckland Council use the IFF to fund and finance infrastructure to support development in order to speed up new development, in a re-written Future Development Strategy.

6. Conclusion

6.1. Property Council welcomes the opportunity to submit on Auckland Council's draft Future Development Strategy. In our view, there is a clear need to revise the draft Future Development Strategy. We strongly recommend that Auckland Council pause the Future Development Strategy, in order to re-engage with the property sector and develop a revised Future Development Strategy that meets Auckland's future needs.

6.2. We believe a more balanced approach to meeting urban growth is needed. While we welcome aspects of the Future Development Strategy, such as Auckland Council's support for encouraging greater urban intensification, we are deeply concerned about proposed restrictions, infrastructure triggers and delays to greenfield development. Property Council also has broad procedural concerns about the manner in which the Future Development Strategy was developed and believes that more accurate data collection is required.

6.3. Property Council members invest, own, and develop property in Auckland. We wish to thank Auckland Council for the opportunity to submit on the draft Future Development Strategy, as this gives our members a chance to have their say in the future of our city. Any further enquires do not hesitate to contact [redacted] We wish to be heard in support of our submission.

[redacted]

Future Development Plan 2023 #8196

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

Agree - provided the regulatory environment supports the safe and efficient operation of the electricity distribution network.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Agree - provided the regulatory environment supports the safe and efficient operation of the electricity distribution network.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Agree - provided the regulatory environment supports the safe and efficient operation of the electricity distribution network.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Agree - provided the regulatory environment supports the safe and efficient operation of the electricity distribution network.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please see Vector's attached feedback.

#8196

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31 July 2023

Growth and Spatial Strategy
Auckland Council
Via email

Attn: [redacted], Manager Growth and Spatial Strategy

Thank you for the opportunity to provide feedback on the draft Auckland Future Development Strategy (FDS).

As New Zealand's largest electricity distributor, the future planning of urban development has implications on how we continue to operate our existing networks and how we plan to service new demand as development intensity increases.

We support the focus of the FDS to concentrate development in existing urban areas, provided the regulatory environment recognises and provides for the functional and operational requirements of electricity distribution.

The National Policy Statement on Urban Development (NPSUD) significantly increases built density in Auckland. Electricity networks such as those operated by Vector and Counties Energy, classified as 'additional infrastructure' under the NPSUD have specific operational requirements – particularly at the sub-regional and local level that must be considered to enable the stated FDS objective of quality compact urban development.

This feedback responds to the FDS in context of the 'additional infrastructure' requirements of the NPSUD and outlines the challenges faced by electricity distributors in servicing new medium / high density development. While sub-regional electricity distribution capacity is generally achievable (Vector proactively plans substation site development and subtransmission routes in line with the projections of the Auckland Forecasting Network), identifying feasible corridors is becoming more constrained as urban density intensifies and road corridors become more congested.

Urban development constraints at the local distribution level also present an increasing risk due to the level of variability in local environmental conditions and development demand. Constraints in this context include risks introduced by third-party activities adjacent to the existing network and new demand created by those activities.

To ensure new development concentrated in urban areas can be efficiently serviced, the spatial planning outcomes required by the NPSUD must be supported by a regulatory environment that:

1. Integrates “additional infrastructure” development requirements including upgrade of existing infrastructure into land use planning decision making to ensure that capacity can be delivered proactively where needed,
2. Protects infrastructure from inappropriate third-party development,
3. Ensures that local capacity is considered and confirmed at the development planning phase; and
4. Ensures that construction, alteration, and repair of electricity distribution networks is enabled and that arbitrary barriers are identified and resolved.

It is important to note that the continued operation and growth of electricity distribution is pivotal to the reduction in carbon emissions and measures to combat climate change outlined in the NPSUD and FDS. The electrification of the economy makes this more pertinent. As such, enabling proactive planning to protect and enable electricity distribution networks that are safe and with sufficient capacity, should be prioritised.

additional infrastructure

While the Auckland FDS is a replacement of the Future Urban Land Supply Strategy, the below assessment of electricity distribution infrastructure addresses the full scope of “other infrastructure” considerations as they relate to electricity distribution in the context of both new and revised strategies.

Additional infrastructure as defined in the NPSUD includes “*(f) a network operated for the purpose of transmitting or distributing electricity or gas”.*

FDS commentary: Electricity distribution is critical for urban development. Unfortunately, the operational requirements of electricity distribution networks have historically been misunderstood and underestimated. Resource consents for new developments are regularly accompanied by infrastructure reports that comprehensively address ‘development infrastructure’ capacity but make untested assumptions about ‘additional infrastructure’ (electricity distribution). Consequently, there is significant opportunity loss at the last-mile service delivery level. Electricity networks are granular and intertwined with the urban fabric of the areas they service. As such, unprecedented modification of the urban environment via significant intensification affects both how we operate the existing network and how we modify the network to accommodate new demand.

Policy 10(b) of the NPSUD states *“Tier 1, 2, and 3 local authorities… engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning”.*

FDS commentary: Integrated land use and infrastructure planning is one of the most important factors in achieving the quality compact urban form that the FDS seeks to achieve. Electricity

distribution infrastructure is most-often only addressed once the planning process has taken place for ad-hoc residential development. This drives inefficiency in development as opportunities to address the functional requirements of the local level infrastructure are lost to the planning process. This is most often the case for the installation of transformers and switchgear required to add capacity to service new local development – there is not always room in the road corridor to accommodate new equipment and consideration is needed for on-site installation for some developments. Electricity distribution requires greater consideration in planning decision-making so that constraints can be resolved at the planning phase alongside other planning issues. It is unclear how the FDS addresses integration of land-use with electricity distribution infrastructure.

requires that "*Local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available."*

FDS commentary: Engagement to date has been insufficient for the FDS to determine that infrastructure capacity is likely to be available. While regional and sub-regional electricity distribution capacity is likely to be available – the regulatory environment does not adequately support the delivery of local capacity. This is reflected in the lack of reference to / supporting actions proposed to ensure that sufficient capacity can be delivered via implementation planning of the FDS.

requires the FDS to spatially identify *"(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and (c) any constraints on development"*

FDS commentary: This is a particularly challenging exercise in the context of granular electricity distribution networks. Electricity distribution infrastructure is present wherever there is urban development. Associated corridors required to provide infrastructure generally align with the legal road corridor (with some exceptions) and so electricity distribution infrastructure is generally located in existing shared service corridors.

Increasingly, the development constraint associated with electricity provision to new urban development centres on the availability of space for new sub-regional and local infrastructure in the road corridor – and the lack of opportunity to locate some of this infrastructure e.g. transformers on development sites where constraints in the road corridor may prevent the installation of new equipment required to service new development. This points to a gap in land-use and infrastructure planning that could constrain development even where infrastructure is considered at a regional or sub-regional level.

requires that *"In order to prepare the draft required by that procedure* [special consultative procedure in section 83 of the Local Government Act 2002]*, local authorities must engage with the following: (d) providers of additional infrastructure"*

DFS commentary: As a provider of additional infrastructure, Vector has not been engaged in the drafting of the FDS – only in the public consultation phase of the consultation draft. This may be due to the FDS being considered a 'revised strategy', however the scale of change introduced by the NPSUD makes more direct engagement with electricity distribution providers necessary.

requires local authorities to '*engage with providers of additional infrastructure.'*

Summary commentary: In its current format, the Auckland FDS is not sufficiently informed by providers of additional infrastructure. Electricity distribution is referred to, but there is no reference to integrated planning approaches for additional infrastructure that would ensure sufficient capacity will be provided to new urban development.

Changes to the Auckland Unitary Plan are identified as one of three broad categories of supporting action to implement the Auckland FDS and outlined at a high level in Appendix 12.

Vector and other network utilities have identified several plan implementation issues, in the Auckland Unitary Plan that need to be resolved to support the outcomes promoted by the NPSUD and FDS. Broadly these include:

A. Lack of protection for existing network assets relative to new urban development:

Distribution lines typically carry electricity at voltages between 400V and 110kV. Where these are located aboveground, specific minimum approach distances – the minimum distance between third party activities (including buildings and scaffolding) and existing overhead lines – are prescribed by the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001 (NZECP34).

NZECP34 – the purpose of which is to protect people, property and mobile plant from electrical hazards – is a regulation under the Electricity Act 1992 and therefore compliance with the minimum approach distances is a legal requirement. Unfortunately, compliance is currently not required to be demonstrated at the resource consent or building consent phase and is commonly overlooked as a requirement for new development. Consequently, Vector's network has experienced a steady increase of encroachment of new development into the minimum approach distance for existing overhead lines since the Auckland Unitary Plan became partly operative in late 2016. Encroachment is expected to increase in scale and severity under Plan Change 78 – Intensification unless an appropriate intervention brings compliance under the umbrella of the Auckland Unitary Plan. Minimum approach distances are a valid development constraint that should be considered for any new development.

Vector has proposed a qualifying matter for overhead electric lines and continues to progress this via the independent hearings process. The issue demonstrates however that there is currently a

gap in the recognition of the functional and operational needs of electricity distribution under the Auckland Unitary Plan.

In a similar vein, fire protection setbacks between ground mounted transformers (and some switchgear) now require more specific encroachment controls as new development intensifies around the network – particularly as front yards reduce the distance between development and the road. Unlike overhead lines that have spacing that allows “air-cooling”, transformers contain oil to disperse heat and ensure safe operation within temperature limits. While transformer installations are safe, modern industry guidelines require a degree of fire-suppression between transformers and adjacent buildings and structures in the unlikely event of a fire. New urban density is ‘squeezing’ the road corridor by bringing development closer to the road than was envisaged when electricity distribution infrastructure was developed – the lack of standards to control this results in fundamental incompatibility between existing infrastructure and new developments and could present a health and safety risk to the public in certain instances.

Avoiding third party encroachment on the network is extremely challenging for infrastructure as entwined in the urban fabric as electricity distribution is. Network operators cannot proactively prevent encroachment – we rely on a robust regulatory environment to ensure that network-compromising land-uses are avoided or sufficiently controlled. Therefore, these operational requirements must be reflected in the Auckland Unitary Plan as development standards. Without this, the safe and efficient operation of the network will continue to be compromised as development concentrates around existing infrastructure. This will ultimately lead to economically inefficient housing development and result in unavoidable electrical hazards.

B. <u>Lack of consideration for service delivery requirements in planning processes and decision making.</u>

Where new development is concentrated in existing urban areas, the shared service corridor provided by the road reserve is typically the only area in which new and upgraded electricity infrastructure can be located. This is because there is a common assumption (perpetuated by a lack of consideration at the development planning phase), that sufficient capacity will “always” be available at the property boundary when a new connection is needed.

Auckland land-use consenting only considers water supply, stormwater, and wastewater as relevant infrastructure assessment criteria for new development. Often a new transformer is required to service new medium/high density development. These cannot be located underground, and sufficient space is required on or near a development site to provide new local capacity. Because this is not considered at the planning phase, the opportunity for a transformer to be located on a development site is lost. Developers are not required to ensure up-front that there is electrical capacity, nor are they required to provide space onsite in compliance with a planning standard or assessment criteria.

Why is this an issue? Auckland's increasingly congested road corridors (both underground and aboveground) mean that we cannot rely on there being sufficient space in the berm to upgrade existing or install new assets. This can be a result of:

- Extremes in road gradient making level installations problematic,
- Variability in road width and associated berm dimensions – some areas e.g. parts of Devonport and other historical suburbs feature narrow streets with no berms, some berms are too narrow to accommodate ground-mounted equipment,
- Road safety considerations e.g. sweeping corners and arterial road traffic volumes that place network assets at risk of third-party collisions,
- Congestion of underground services preventing ground mounted transformers being, installed e.g. critical watermains,
- Trees, bus stops, streetlights, and other street furniture,
- Historic heritage overlays extending into the footpath / berm,
- Driveways, pram crossings and other paved areas that reduce berm availability,
- Third-party designations e.g. wastewater interceptors and other infrastructure that may restrict new installations in particular corridors,
- Volcanic view shafts and other restrictive visual overlays restricting potential infrastructure development.

Where there is no room in the berm or on the development site, this increasingly results in the only available space in the local network being within a local Auckland Council open space reserve. Vector's preference is to install equipment in the road or on a development site to avoid reliance on local reserves for distribution equipment. To avoid the necessity of reserve installations, more consideration is required for onsite infrastructural requirements at the planning stage.

C. Arbitrary barriers, overly prescriptive standards and unintended consequences that reduce efficiency of service delivery and result in delays in infrastructure provision to new development.

The rules and standards contained in Auckland Unitary Plan Chapter E26 - Infrastructure and companion standards in other chapters e.g. E36 – Natural hazards and flooding have been operative since late 2016. In application of the plan and associated consenting processes, several issues have been identified that arbitrarily restrict or delay the planning process.

Examples of these include but are not limited to:

- Overly restrictive rules for upgrades of equipment in natural heritage overlays e.g. Volcanic view shafts which regularly require public notification, even for minor changes to

infrastructure. This adds considerable cost and delay for projects that are typically associated with increasing network resilience or upgrades / replacement of poles at end of life or to improve loading strength or to accommodate nearby third-party development e.g. new vehicle crossings.

- Arbitrary rules around heritage sites e.g. immediate consent triggers for non-archaeological ground disturbance near heritage buildings where works are required to upgrade / replace existing connections to existing development within those buildings. This could be better managed with permitted standards requiring vibration controls and compliance with accidental discovery protocols.
- Unintended consequences resulting from definitions e.g. hazardous substances that trigger unintended compliance requirements and resulting consenting burden associated with rectifying semantic wording issues rather than dealing with real environmental risk.
- Arbitrary dimension rules for network equipment that do not account for functional / operational changes to electricity equipment e.g. replacement of network switchgear in the berm with a slightly larger modern-day equivalent that might exceed the permitted height standard.

It is appropriate and necessary to allow for implementation issues as outlined above to be rectified in support of the incoming increases in development density under the NPSUD and FDS. In vector's experience, most consent applications are issued with few, if any, changes recommended by Auckland Council. This indicates that a review of the infrastructure rules and standards would be appropriate to increase efficiency in the planning system and reduce the number of arbitrary consent required.

To ensure that electricity distribution infrastructure is appropriately recognised, Vector recommends that Auckland Council undertakes the following supporting actions associated with the FDS:

a. Engage more directly with 'other infrastructure' providers to ensure risks and constraints are comprehensively addressed in development planning,

b. Support Vector's Plan Change 78 qualifying matter for overhead electrical lines to ensure security and safety of the existing overhead network,

c. Require that additional infrastructure, including electricity distribution is considered in land use development planning as an integrated requirement; and

d. Initiate a plan change to identify and resolve existing implementation issues in the Auckland Unitary Plan that prevent the efficient and effective delivery of infrastructure to new development.

Please feel free to contact me about the contents of the above feedback. Vector is ready to engage with Auckland Council on the supporting actions above to ensure Auckland can achieve its planned quality compact urban form.

Kind regards

[redacted]

Resource Management & Planning Lead

Future Development Plan 2023 #8200

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Your feedback

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We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

see attached feedback from KiwiRail Holdings Limited

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

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Tell us why

see attached feedback from KiwiRail Holdings Limited

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As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why
see attached feedback from KiwiRail Holdings Limited

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why
see attached feedback from KiwiRail Holdings Limited

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

see attached feedback from KiwiRail Holdings Limited

Future Development Plan 2023 #8211

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Your feedback

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Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. **What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?**

Tell us why

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We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please find the full submission attached.

Waitematā Harbour Connections

WAITEMATĀ HARBOUR CONNECTIONS

28 July 2023

Attn: Dawne Mackay, Elise Webster and Katrina Hunt
Plans Strategy and Research Team
Auckland Council
92300 Victoria Street West
Auckland 1010

cc. Brian Waddell, Waka Kotahi NZTA

Dear Dawne, Elise and Katrina,

Subject: –

The purpose of this letter is to outline the Waitematā Harbour Connections project team's initial feedback on the Auckland Council draft Future Development Strategy. We acknowledge that this will be an iterative process working with our partners to achieve joint outcomes for Tāmaki Makaurau.

The feedback provided has been restricted to a few key points related to the WHC project, rather than the FDS document as a whole.

Executive Summary

The Waitematā Harbour Connections ('WHC' or 'the Project') will provide new multi-modal transport connections across the Waitematā Harbour to Auckland's North Shore and is expected to shape future growth.

Auckland Council is currently consulting on the Future Development Strategy ('FDS'), which is a long-term strategic planning document that sets the high-level vision for accommodating future urban growth and identifies key strategic priorities.

The WHC team has provided feedback to Auckland Council on the FDS, with a focus on how it relates to the rapid transit and land use aspects of the Project.

The following relief is sought in relation to these matters:

- Include Takapuna – Smales Farm as a node
- Provide greater detail on intended growth areas for the North Shore
- Include Albany as a Year 11 – 30 Spatial Priority Area
- Provide greater detail about the intended growth outcomes for the nodes, particularly Albany
- Place greater emphasis on accommodating growth along existing and future rapid transit corridors and strengthen the wording of Principles 3 and 5

- Update the description of the WHC project as provided in Section 4.2.5 and Appendix 9, in light of its current status and linkage with the wider rapid transit network, in collaboration with the project team.

Overall, we would encourage Auckland Council to work closely together with the WHC to achieve alignment on the outcomes sought by the FDS.

Context

The WHC Project is a significant city shaping project which will play a fundamental role in guiding the development of growth on Auckland's North Shore. The project will provide new multi-modal connections for people wanting to walk, cycle, take the bus, travel by light rail, drive, or transport freight across the Waitematā Harbour. It will connect people to transport options across the region and beyond and shape future growth on the North Shore. WHC is being developed in partnership with Ngā Iwi Mana Whenua o Tāmaki Makaurau, Auckland Transport and Auckland Council.

The FDS is a key guiding document that sets out the Auckland Council plan to manage growth across Tāmaki Makaurau for the next 30 years, both within the city and in greenfields locations. It seeks to integrate long-term land use and infrastructure planning while meeting future environmental, population, housing and employment needs. The FDS replaces the existing Auckland Plan 2050, Development Strategy 2018 and the Future Urban Land Supply Strategy 2017.

Feedback

<u>High Level Summary</u>

The WHC Project initial feedback relates to the following key matters which are elaborated on in latter sections:

- The role of Takapuna
- Centres hierarchy
- Long term growth priorities
- Growth outcomes for nodes and 'Spatial Priority Areas'
- The role of the rapid transit network in shaping growth
- Appendix 9
- Working together

<u>Specific Matters</u>

- The Role of Takapuna

  Takapuna is identified as a key node for residential development and employment growth for the WHC project as this is supported by the existing Metropolitan Centre zoning in the Auckland Unitary Plan.

  Takapuna's proximity to the growing Smales Farm employment area and North Shore Hospital creates a linear corridor along Taharoto Road where high-density growth can be concentrated and be supported by significant transport investment. Opportunities also exist along the Barrys Point Road corridor, which is underlain by the current permissive Mixed-Use zoning and is suitable for redevelopment for both residential and commercial uses.

  As such, the project team believe that there is a strong case for the Takapuna-Smales Farm area to be included in the FDS as a node within the multi-nodal model and within

Appendix 5. A potential node extent is shown below in red; the area shown is indicative only and seeks to include the core Takapuna and Smales Farm business areas, along with the Barrys Point and Taharoto Road corridors. This area also includes key trip generators such as the Auckland University of Technology North Shore Campus, North Shore Hospital and Akoranga Business Park, along with potential development sites such as 48 Esmonde Road. A setback is provided from the edge of Lake Pupuke and Takapuna Beach.



Relief Sought:

- **Include Takapuna – Smales Farm (including the Taharoto Road corridor) as a node as indicated in the illustration above.**

➢ Centres hierarchy

The information supporting the planned spatial priority growth areas is high level and does not delve into where growth will be prioritised beyond the selected nodes and spatial priority areas. While large scale growth may be expected in these areas, significant growth is still provided for in a number of other areas throughout Auckland through the Auckland Unitary Plan. The FDS does not provide a 'hierarchy of centres' for where growth is expected or should be prioritised outside of the identified areas.

The FDS also does not provide an overall spatial plan for Auckland, unlike previous versions of the Auckland Plan. While Figure 18 ('Spatial Priority Areas') identified the key spatial priority areas, more detail is needed on secondary growth areas.

Relief Sought:

- **Include a 'hierarchy of centres' for development area priorities.**
- **Provide an overall spatial plan for Auckland, including secondary growth areas.**

- Long Term Growth Priorities

  The WHC Project is identified within the draft FDS as a key project to unlock growth in the longer term (Page 52), however the FDS is largely silent on where growth should be accommodated as part of this project due to unknowns about the alignment. More direction is needed in the FDS on where growth should be prioritised on the North Shore, as the Indicative Business Case ('IBC') assessment for WHC relies in part on aligning the Project with Auckland Council growth strategies and seeks to realise the intent of those strategies. While the WHC business case process is progressing, the decisions made to date on the Project should be reflected in the FDS. We note that there are no spatial priority areas identified on the North Shore. The project team advocate for Albany to become a long-term spatial priority area to clearly identify expected growth in this area, and to signal the investment required to support the growth that will occur within this area in the 11 – 30 years timeframe.

  The potential for the WHC project to shape long term development priorities is mentioned on Page 52 (Section 4.2.5), which the project team supports, however more emphasis should be placed on the ability for the new rapid transit project to shape growth beyond the motorway. This section should also be updated to reflect the progress to the WHC project.

  Relief Sought:

  - **Provide greater detail on intended growth areas for the North Shore, including incorporating the decisions made to date on the WHC project.**
  - **Include Albany as a Year 11 – 30 Spatial Priority Area.**
  - **Update the description of the WHC project in Section 4.2.5.**

- Growth Outcomes for Nodes and Spatial Priority Areas

  Some information is provided on the Nodes in Appendix 5 ('Information on the nodes'), however this quite high level. Further detail should be provided on the outcomes sought for the key growth areas, including the mix of uses, types of employment sought, scale of development envisaged, and the level of growth sought and what investment is required to support the growth. The decisions made on the WHC Project and the assessment to support these decisions will also inform this, particularly at Albany and Takapuna (should this be included as a node). The project team encourage a collaborative approach to work together and agree suitable outcomes for these areas.

  Relief Sought:

  - **Provide greater detail about the intended growth outcomes for the nodes, particularly Albany. This can be informed by the work undertaken to date by the WHC team on the short list and emerging preferred options.**

- The Role of the Rapid Transit Network in Shaping Growth

  The project team consider that more emphasis on the importance of rapid transit in shaping better urban development and employment outcomes is required in the FDS. Future growth should be concentrated on both the future WHC corridor and the existing Northern Busway corridor, which can accommodate significantly more growth in areas such as Albany and Smales Farm (particularly in light of Plan Change 23).

  This change could be incorporated by providing more specific direction in the 'Principles for growth and change', specifically Principles 3 and 5, which state:

- *Principle 3: Make efficient and equitable infrastructure investments*
- *Principle 5: Enable sufficient capacity for growth in the right place and at the right time.*

The project team supports the intent of these principles, however they could be strengthened by placing more emphasis on investing in infrastructure to support growth along the existing and future rapid transit network. This would align with the intent to enable growth in the right place and to make efficient investment decisions.

Finally, Section 4.2.1 Point 3 discusses the potential for major projects such as WHC to contribute to long-term development patterns and states *"There are major projects being planned, such as Auckland Light Rail, the Waitematā Harbour Connections and North-west rapid transit, that potentially offer significant long-term benefits for Tāmaki Makaurau. These also, however, add further uncertainty in terms of region-wide development patterns."* We request the wording of this section to be changed to provide more support for these projects to direct growth.

Relief sought:

- **Place greater emphasis on accommodating growth along existing and future rapid transit corridors.**
- **Strengthen Principles 3 and 5 and Section 4.2.1.3 of the draft FDS to place more emphasis on investing in growth on the existing and future rapid transit network.**

➢ Appendix 9 - Waitematā Harbour Connections

The project team recommend working together on the final wording in Appendix 9: 'Information on major projects' for Waitemata Harbour Connections as project has evolved and further decisions have been made since this appendix of the FDS was written. The existing commentary currently lacks detail, focuses primarily on the crossing portion of the Project, and does not indicate the timing of when the project may occur. More emphasis should be placed on building a new rapid transit line on a different alignment to the Northern Motorway and connecting to new communities.

The connection between the WHC Project, Auckland Light Rail and the North West rapid transit project, and the overall importance of the future rapid transit network in shaping future growth in Tamaki Makaurau should also be made clearer. The project team suggests that a future rapid transit network is included in this appendix, or within the main text of the FDS, to show the future network and how it will influence growth.

Relief Sought:

- **Update the description of the WHC project is provided in Appendix 9, in collaboration with the Project team.**
- **Provide more emphasis on the future rapid transit network, both as it relates to WHC and Auckland Light Rail / North West.**

➢ Mahi tahi – Working Together

The WHC project team would like to emphasise the need for our teams to work collaboratively to agree outcomes for the FDS, given the significant influence the Project will have on this strategy. The project team recommend that the FDS should respond to the outcomes of the WHC project and vice versa to ensure consistency and alignment of strategy.

It is appreciated that the initial consultation draft did not have the detail at hand to provide a clearer direction regarding some of the major infrastructure projects to occur in the city. However, as the WHC project progresses and further decisions are made on the path to a recommended option, we would welcome meeting with Auckland Council to discuss the outcomes sought by the Project. We would appreciate any feedback from Auckland Council on how we can best facilitate a collaborative approach.

Conclusion

Thank you for the opportunity to provide and discuss feedback as to how this significant project aligns with the FDS, and how we can ensure there is clarity for the WHC project in achieving the outcomes sought in the FDS.

We look forward to meeting with you to discuss the matters raised.

Ngā mihi



Kathryn Martin

On behalf of the WHC Team

Future Development Plan 2023 #8241

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why
See submission

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why
See submission

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why
See submission

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why
See submission

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

See submission

#8241

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission to the **AUCKLAND COUNCIL** by **AEDIFICE DEVELOPMENT NO. 1 LIMITED**, in respect of the **CONSULTATION DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053**

SUBMISSION ON THE CONSULTATION DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

DATED 31 JULY 2023

To: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
AUCKLAND 1142

1. **INTRODUCTION**

1.1 This submission is made by Aedifice Development No,1 Ltd ("ADL"). The submission relates to the Consultation Draft Auckland Future Development Strategy 2023-2053 (the "draft Strategy").

1.2 ADL's submission relates to the implications of the draft Strategy for Pukekohe East.

1.3 ADL is not a trade competitor for the purposes of the draft Strategy and could not gain an advantage in trade competition through this submission.

2. **CONTEXT**

2.1 ADL has recently secured Plan Change 76 to the Auckland Unitary Plan and is seeking further plan changes to optimise the development of its land.

3. **REASONS FOR ADL'S SUBMISSION**

3.1 ADL is opposed to the draft Strategy in relation to Pukekohe East. This submission addresses:

(a) The requirement to provide ADL an opportunity to be heard; and

(b) Proposed changes to the timing for Pukekohe East.

4. **SPECIAL CONSULTATIVE PROCEDURE REQUIRES REASONABLE OPPORTUNITY TO BE HEARD**

4.1 Clause 3.15 of the National Policy Statement on Urban Development ("NPD-UD") requires local authorities to use the special consultative procedure in section 83 of the Local Government Act 2002 ("LGA 2002") when preparing or updating a Future Development Strategy.

4.2 The s 83 special consultative procedure states that a local authority must ensure that any person who wishes to present their views to the local authority or its representatives is given a reasonable opportunity to do so and is informed about how and when they may take up that opportunity (per s 83(1)(d) and (e)).

4.3 We understand that there are no plans to have a hearing for submitters to present their submissions to the Planning, Environment and Parks Committee. There will only be Local Board meetings before the Committee considers the feedback from the public and local boards, and provides their decision on adoption. This would be in breach of section 83.

5. **PUKEKOHE EAST**

5.1 The draft Strategy recognises that:

(a) Pukekohe is an established rural node located approximately 50 kilometres south of the city centre that serves a wide rural catchment;

(b) It is located on the rail line and is connected to State Highway 1 and the rest of region via State Highway 22;

(c) Significant growth is anticipated in this area over the next 30 years; and

(d) The past five years have brought important major investments to the area such as rail electrification, express rail to Hamilton to strengthen its connection to nearby Waikato rural towns and settlements (Waikato Growth Strategy).

5.2 The draft Strategy incorrectly identifies Pukekohe East as future urban (Appendix 8), part is live zoned and other parts are subject to a plan change. This is a significant error.

5.3 The draft Strategy fails to recognise, or appropriately recognise:

(a) The significance of the identified major investments, such as rail electrification, the benefits of which have not yet been fully seen;

(b) The existing level of planning – through the Pukekohe Paerata Structure Plan – which has addressed many of the concerns raised in the draft Strategy, including but not limited to natural hazards;

(c) The existing committed investment in wastewater and stormwater infrastructure which is capable of servicing Pukekohe East;

(d) The extent of commercial and industrial land capable of providing jobs to people living in Pukekohe East, without the need to travel to Auckland;

(e) The cost efficiency of providing drinking water to Pukekohe East from the Waikato River;

(f) The existing demand for housing in Pukekohe;

(g) Recently operative Plan Change 76 which provides a node for further development and which assists to enable further cost-effective development in the Pukekohe East area;

(h) Existing plan change proposals for further residential development within Pukekohe East; and

(i) Existing plans to provide additional commercial land and / or community facilities which provide for the day to day needs of residents, which anticipate the completion of development within Pukekohe East.

6. **RELIEF SOUGHT**

6.1 For the foregoing reasons, ADL seeks the following outcome in relation to the draft Strategy:

(a) Do not change the timing of development in Pukekohe East from what is in the FULS, i.e. keep it 2023 – 2027.

6.2 ADL wishes to be heard in support of this submission.

6.3 If others make a similar submission, ADL will consider presenting a joint case with them at hearing.

DATED at **AUCKLAND** this 31st day of July 2023



_____

[redacted]

Counsel for Aedifice Development No.1 Ltd

Address for service of the submitter:

[redacted]
The Environmental Lawyers
[redacted]
[redacted]

Future Development Plan 2023 #8248

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

Denser cities make it easier to provide more amenities like public transport, walking and cycling infrastructure, and social infrastructure. It puts people closer to jobs, entertainment, family and friends, all of which can help to reduce travel or enable travel by lower emission methods. Additional infrastructure needed to support more brownfield growth also benefits existing residents.

Large amounts of greenfield growth make it much harder to provide all of this and adds significant costs to the council and government.
Furthermore, furthermore, Auckland's growth has over recent decades has shown that the vast majority of people are choosing to live in new homes within the existing urban area rather than greenfield developments. As such, it makes sense to prioritise that brownfield growth and reduce the greenfield growth available.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Future Development Plan 2023 #8258

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Your feedback

Focusing growth

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Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

- Greenfield development allows for flexibility in design, it creates a blank canvas for design, infrastructure and well thought out communities. Look at Canberra as an example.

- Innovation and modernisation in greenfield practices ensures that we can use the latest technologies, sustainable practices and climate related responses. It allows us to innovate with energy, waste management, transport and urban living.

- It creates economic growth. Just look at the growth around Drury and the investment of some of New Zealand's largest businesses. Why would you want to slow this down when they are investing millions of dollars in construction and state of the art manufacturing which will allow Auckland to shine.

- Housing demand. Affordability has more room to be considered in a greenfield development. Affordable housing is not just a unit. We've built over 500 affordable homes on the land next to the areas in Takanini, Opaheke and Hobsonville where you now propose to blacklist and remove from future urban development. These families live in beautiful, modern homes, well designed and all have a yard for their children to play in. As Councillors is it your right to remove this from Auckland families? Why not focus on ensuring your resource and building consent process meets the needs for the future and let us work within that framework rather than selecting large areas of land close to commercial and town centres that will be permanently vacant.

- Community building. We have a great supportive community in Papakura, Takanini, Opaheke and Drury. Let us revitalise this area and continue to protect the mana of this area.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

Your question is loaded and clearly designed to give you an answer that fits with your proposal. Please don't guide the reader into an answer.

People do want accessible centres, yet this proposal only looks at five key areas. It makes the rest of the city feel like there will be no investment outside those suburbs.

Your proposal includes rezoning land within walking and cycling distance to Papakura and Takanini. This does not feel like you are truly proposing housing and business development in local centres. This feels like you are blocking hundreds of hectares from development in areas where affordable housing and considered development is needed the most.

It is hard to see how communities like Papakura, Takanini and Drury don't need housing intensification and support to revitalise them. By denying this development and population growth, not only will it undermine the ability for sustainable and healthy new suburbs, it will also undermine the ability of these existing communities to flourish.

Please work with local businesses including commercial, manufacturing and construction to better understand the detail of the areas and ask the residents for ways to make this possible. Don't rely on your employees to make the best call when they live outside the area.

Think about this at a more grassroots level and allow the investment and innovation of our suburbs that are not in the CBD.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

Based on the supporting information, there is a clear implication that the Drury/Opaheke area is highly susceptible to flooding and other environmental risks. This is misleading and incorrect. While the Drury township area had localised flooding around the estuary area (which considered development will address) the bulk of the area had minimal to no impact from the recent cyclone and weather events. Furthermore the planning and development of new suburbs caters for this type of event extremely well and provides communities with lower environmental hazards than older higher density suburbs with ageing infrastructure/insufficient stormwater capability.

Innovation is the key here. Please do not make 30 year decisions that lock us into something that may have a very clear answer in a shorter time frame. Look at the impact of Uber or Netflix. Did anyone suspect 15 years ago that we would have these solutions? Please ensure your decision allows for flexibility in the future, not cold and hard lines in the sand.

Please do not use climate change as a way to make planning zone changes to suit your current budget constraints. There will be many exciting ways that allow us to construct affordable, sustainable homes in the outer areas of Auckland that will meet the needs of climate change. This can only be achieved if you continue to support education and business (and this includes construction and manufacturing) in all areas of Auckland - not just the city.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why

Please tell us what your definition of decentralisation is? This makes us assume that you won't be paying for vital infrastructure.

How would the Councillors propose the city will look without investment in vital climate change infrastructure in the event that there is no decentralised investment. What does that look like?

As businesses we are more than happy to invest in necessary infrastructure and most businesses need to do this already. This proposal has the potential to cost our business significantly as you restrict the areas we can build affordable homes in Auckland in greenfield developments. How can you then ask us to invest in climate change infrastructure when you're restricting our ability to act as a business?
Give us the flexibility to invest in greenfield development where we can design nature based infrastructure into the design and build it from the beginning. It's a much cleaner and efficient way to build communities for the future. We want to continue to work in and around Papakura, Opaheke and Takanini to do this. Please don't restrict our land options to do this.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please do not make long term decisions that will impact our city for the next 30 years that cannot be undone if we find more innovative ways to work and build our homes and town centres.

For future feedback, please ensure you communicate clearly with everyone impacted, including small to medium sized businesses. We have had no formal notification of this from Auckland Council.

There is also concern that the urban environments that will be impacted by the proposed intensification are unaware of the long term impact on their communities. As such have not been given sufficient opportunity for consultation on this proposal as well. Are people in Manukau and Mt Roskill aware you are planning on turning their suburbs into construction zones for the next 20 years as never-ending infrastructure upgrades and multi-level developments are built around them.

Future Development Plan 2023 #8264

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Your feedback

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1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

As long as all of the other infrastructure is there as well.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Take into account all of the recent climate change events that will impact FUA, especially Dairy Flat

[redacted]

#8264

Goodland Country Estate Trustee Company Limited

Supporting Growth: Response to proposed Dairy Flat Future Urban Areas and Future Transport Projects

Goodland Country Estate Trustee Company Limited

[redacted]

Property Address: [redacted]

Goodland Country Estate is operated under a Joint Venture Agreement and comprises a 100 hectare lifestyle farm and residential property. It comprises 63 privately owned house sites and 70 hectares of farm. The remaining land is divided into private roads, verges and community amenities and associated infrastructure. The owner of each house site also has a 1/63rd share of the farm property.

The Estate is managed by a management committee of five elected residents. The committee oversees all activities under the Joint Venture Agreement, including the daily operations of the estate and farm, finances, roading and the wastewater treatment plant.

The committee is also there to represent the community's interests and the content of this document represents the collective feedback of the 63 property owners in the Estate. It includes implications on operations, legal and property issues and impacts on residents.

Residents may be providing feedback regarding the implications of the proposed changes to their own property within Goodland Estate.

Firstly, all residents of Goodland Estate unanimously and vehemently agree that both the proposed Dairy Flat Future Urban Areas and Future Transport Projects **must** be placed on hold **immediately**. The reason for this is that there are a multitude of issues that have not been adequately considered, investigated or resolved.

The Future Development Strategy (FDS) is a visionary document and has great plans for development of Auckland City. This can be achieved through both, expansion into future urban zones and growth through intensification within existing city zone boundaries.

Development of Future Urban Areas is extremely challenging and emotional for existing owners of property, businesses, land, and homes. For many people their home is their biggest asset, often used for retirement, and a core part of their financial security. **We believe that there is a moral obligation of Central and Local Government agencies to move carefully and thoughtfully through the process of rezoning.**

At this stage we do not believe that this obligation is being considered for the residents of not just Goodland Country Estate but many of our wider neighbours in the Dairy Flat area. We assure you that this is not nimbyism*. We have genuine concerns about the dogged determination to follow the process that has been started and the speed that this is being pushed through (as often happens during an election year!).

Our greatest concern is the disconnect in the process between Auckland Council and the Waka Kotahi/AT Alliance. This will result in the issuing of NoR's and subsequent designations over 'yet to be confirmed' Future Urban Areas prior to further investigations as required from Auckland Council below.

1. Information from Auckland Council:

The following is a summary extract from a recent Auckland Council Meeting. This highlights their issues and concerns to the Dairy Flat area and they have changed the status for Dairy Flat as shown below:

Status for Dairy Flat: Timing delay and recommend for further investigation

Dairy Flat is recommended for further investigation. Dairy Flat is not planned to support the future urban development before **2050+**

This area is recommended for further investigation due to:

- **Infrastructure**
    - Transport infrastructure is not planned to support development before 2050+. Rapid transit, frequent transit routes, key arterials and provision of active modes are required to support development and achieve strategic outcomes.
    - A Waste Water Treatment Plant upgrade is also required to support development in this area

- **Urban form and business land retention**
  Further consideration is needed to understand the relationship of Dairy Flat to the Silverdale West Industrial Area and the impact any changes might have on planned infrastructure such as rapid transit and potential new local centres.

- **Emissions/VKT reduction**
  Potential for higher VKT and CO2 emissions than other FUA's due to Dairy Flat being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUA's

- **Natural Hazards**
  Moderate hazard constraints including approximately 16% of the FUA exposed to the 7% AEP flood plain. A moderate proportion of the FUA contain some risks of settlement, and high risk of slope instability

2. Specific impacts on Goodland Country Estate

Each of the 63 residents own a share in the farm, and we all pay an equal share in the running of the estate. The potential loss of 5 to 7 properties will leave the remaining residents paying more for the running of the estate.

The seven proposed NoR's for areas on the farm will reduce the farm area which also means less income from the farm lease. We will also lose the dam and main water tank which is the source of trough water for the stock.

Goodland Country Estate has a centralised wastewater treatment plant and disposal fields. Both the treatment plant and disposal fields run along the fence line of the Estate where it joins Dairy Flat Highway. All of this area is within the draft designation boundary. An approximate cost of $1.8 to $2.2.million to replace the plant and fields elsewhere on the Estate if suitable land that meets stringent Auckland Council wastewater requirement, especially in flood plain areas, is available.

Goodland Country Estate must meet the requirements of its' Joint Venture agreement. Changes on land use for the relocation of required infrastructure, etc will require reconsideration by Auckland Council at considerable associated cost.

In summary:

- There is currently a lack of infrastructure (waste water, storm water and transportation) for the Dairy Flat area. This will need to be addressed at a considerable expense before any future development

- There are significant natural hazards in Dairy Flat, especially the flood plains. We have seen extensive flooding in the recent storms which will only get worse from climate change. This will significantly and negatively impact the land available for development

- The proposed development for Dairy Flat is not planned till 2050 - if it goes ahead at all. Lodging NoR's on a significant number of residential homes and properties that 'may' be needed in 27 years is completely unfair and will create unnecessary hardship to property and home owners.

- There is a significant risk that property owners affected by NoR's will try and sell these generally high-value properties in the short term, even though the development is not until 2050. This will require a significant level of funding from central and/or local government which has not been allocated.

- There are other major developments in surrounding areas that have been placed on hold or refused consent from Auckland Council. This reason for this, as quoted from Auckland Council was "due to climate change, protecting the natural environment and a Government push". These need to be resolved before any further discussions, consultation, decisions or NoR's are progressed.

The Council is currently reviewing and investigating the proposed plan for Future Urban Areas. The scope of Dairy Flat investigations include infrastructure, wastewater, emissions, urban form and business land retention, and natural hazards, including floodplains and slope instability in areas. Dairy Flat is not planned for future development till 2050.

Until this investigation has been completed and reviewed by Council there should be **NO** further progress on zoning for Dairy Flat as a FUA or any Future Transport Projects, as they may not be needed at all. The process to remove NoR's is long, arduous and expensive for everyone. Making a considered decision, particularly in light of recent weather events, will benefit all.

[redacted]

#8264

[redacted]

Chairperson
Goodland Country Estate Trustee Company Limited

Future Development Plan 2023 #8269

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

It depends on which existing urban areas you are talking about. Mangere and Otahuhu are two of the most deprived areas in Tamaki Makaurau, so 'growth' tends to look like ad hoc, last-minute intrusions, relying on apathy from the locals, who are more concerned with basic survival. Build more housing, which can house 5+ people per household humanely and without risk of flooding.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

You also need to make decent space for cafés, resource centres, parks, and other greenbelt spaces. Linking up and building protected cycle paths is crucial for me and my family. This is not evident in Otahuhu where are we live.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

Well, that is bloody obvious. It's quite rich for Council to use this information retrospectively. What is needed is for council staff, including the Mayor, to be

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

A good idea is to ASK the community to get involved in planting, planning etc. if possible.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Prioritize climate action that is cheap, fast and safe like cycling. Invest in bike acquisition that is easy and bike safety like D-locks, chain locks, helmets, lights, chain lubricant, etc..

Future Development Plan 2023 #8273

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

The Submitter considers that greenfield development within the Future Urban Zone ("the FUZ") is part of the solution to managing Auckland's growth. It is accepted that intensification (infill) of

Page 3 of 11 the existing urban area is also an important means of accommodating growth. However, the two approaches can and should co-exist, in order to provide housing choice, efficient provision of
infrastructure, homes close to existing sub-regional centres and towns, workplaces adjacent to existing transport infrastructure and residential growth areas, and resilience in the face of climate change. The Submitter is of the view the coexistence of both greenfield and infill housing will provide the best opportunity of supporting a competitive land and development market

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

that land supply will continue to occur with a combination of urban consolidation, greenfield development, and the expansion of satellite townships;
(iii) that growth needs to be serviced by adequate infrastructure, with a range of funding options explored including innovative methods and participation by the private sector (investment and development)

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

that stormwater and flood plain management are important factors and need to be considered in the release of land, but recognising different appropriate methods to manage such land;
(v) That these principles are applied on an area by area basis to identify the release of land

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why

Please see attachment - Submission

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please see attachment - Submission

#8273

FEEDBACK ON THE AUCKLAND COUNCIL'S DRAFT AUCKLAND FUTURE DEVELOPMENT STRATEGY 2023-2053

To: Auckland Council

Name of submitter:

This submission provides feedback on the Auckland Council's draft Auckland Future Development Strategy 2023-2053 ("FDS").



Figure 1 – 24 Bristol Road, Hobsonville

We note that under the Auckland Future Urban Land Supply Strategy, dated 7 July 2017 ("the FULSS"), 24 Bristol Road is identified as development ready in the first half of decade two 2028-2032. This is indicated in Figure 2 below.

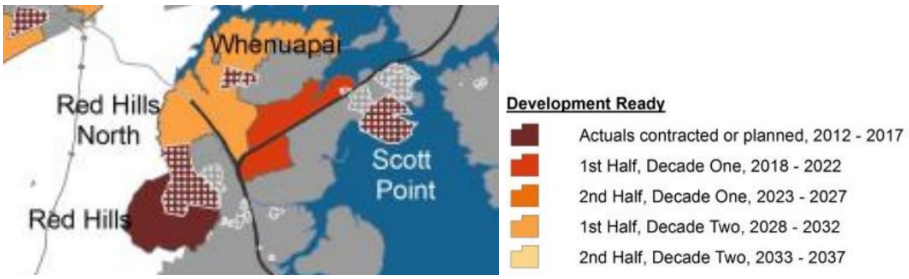


Figure 2 – Auckland Future Urban Land Supply Strategy Map

The submitter has the following feedback in relation to the provisions noted above:

1. That the current FDS is withdrawn for the reasons set out in the following feedback and the Council reengages with the community and key stakeholders to reconsider the approach to the FDS.

2. That the future urbanisation of Bristol Road is accurately captured in any eventual FDS document, and is noted as development ready land, with a proposed timing of 2025+.

The reasons for the submitter's feedback are:

Introduction

1. The Submitter has significant concerns with respect to the Consultation Draft of the Auckland Future Development Strategy 2023-2053 ("the FDS"). It shows 24 Bristol Road as having a new timing for urbanisation for 2050+. Refer map from the FDS for Whenuapai in **Figure 3**.



Figure 3: Proposed timing and approach for Hobsonville and Whenuapai Urban Areas

2. The Submitter is deeply concerned about the significant shifting of policy settings in the draft FDS. This approach creates significant investment uncertainty. Many land developers, including The Submitter rely on clear and consistent policy positions when undertaking expensive long term investment decisions.

3. The Submitter notes that Auckland's anticipated population and dwelling growth over the next 30 years has been planned for under the approved Auckland Plan 2050. The Submitter generally supports that Plan. The Submitter notes that under the current strategic framework, around 62 per cent of development over the next 30 years is anticipated to be within the existing urban area. The remaining development is anticipated to occur in future urban areas (32 per cent) and in rural areas (6 per cent).

4. Within this long-term strategic planning context, there is a need for consistency and certainty to enable efficient public sector investment in infrastructure and private sector delivery of development projects. While a review of the FDS is required (clause 3.16 of the NPS-UD) in order to align with three-yearly Long-term Plan cycles, significant change at these times is not considered to be appropriate as it will undermine public confidence in a consistent approach to strategic planning.

5. The Submitter considers that greenfield development within the Future Urban Zone ("the FUZ") is part of the solution to managing Auckland's growth. It is accepted that intensification (infill) of

the existing urban area is also an important means of accommodating growth. However, the two approaches can and should co-exist, in order to provide housing choice, efficient provision of infrastructure, homes close to existing sub-regional centres and towns, workplaces adjacent to existing transport infrastructure and residential growth areas, and resilience in the face of climate change. The Submitter is of the view the coexistence of both greenfield and infill housing will provide the best opportunity of supporting a competitive land and development market.

6. FUZ areas recommended for "further investigation" or "TBC" on the FDS maps (refer Figure 13) are vague, uncertain. There can be no reliance on the retention of the FUZ on that land over the longer term. Identifying land in that manner in the FDS is not an appropriate approach for a strategy that is intended to provide development and investment certainty.

7. Long-term identification of future urban areas (2050+, for example) contributes to planning blight of the land over an extended period. The effect of significantly delayed urbanisation on land that has been signalled for such growth is lack of investment, removal of any significant productive potential, and creep of unauthorised urban activities. The amenity of such areas is greatly reduced, and that is a poor outcome if sustained for any significant period.

8. There is also an element of natural justice and fairness to consider in relation to the draft FDS. Developers, investors, and the public generally will have made decisions based on the current FULSS and the broader development strategy contained in the Auckland Plan 2050. Anyone purchasing land in the FUZ will have paid for the land based on a value that is heavily influenced by the clearly signalled development potential. The only discount applied, relative to 'live-zoned' urban land, is that relating to timing. An investment of this nature, where the future development potential is now being removed or substantially delayed, could result in financial ruin. Guiding strategy documents around urban growth should not be altered in any significant way.

9. The Submitter understands that experience in Auckland since the advent of the AUP and the Auckland Plan 2050 has shown that, even with greenfield land available, at least 80% of new residential development has been established within the existing urban area. Auckland is well ahead of its intensification targets established in the AUP and Auckland Plan 2050, and further intervention is clearly not required.

10. The Submitter notes that the current the FULS outlined a programme for rezoning key parts of Auckland to enable growth. The only growth area subject to an Auckland Council plan change was Whenuapai (Plan Change 5). That public plan change was withdrawn by Council because of financial problems over infrastructure.

11. The Submitter notes that all other plan changes in north, west, east and south Auckland have relied on private plan changes to deliver the outcomes of the FULS. Without the private sector business and residential land supply (and housing costs) in Auckland would have been even more constrained.

12. The Submitter considers that is critical for Auckland that private investment and the provision of greenfield land is part of the solution.

National Policy Statement on Urban Development 2020 ("the NPS-UD")

13. The Submitter notes that the purpose of the FDS, as required by the National Policy Statement on Urban Development 2020 ("the NPS-UD"), is to set the high-level vision for accommodating urban growth over the long term and to identify strategic priorities to inform other development related decisions, such as the provision of infrastructure. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to assist in deliver well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future as required by Objective 1 of the NPS-UD.

14. The Submitter also notes that Objective 2 of the NPS UD seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets. From The Submitter perspective, it is important that sufficient opportunities are provided for a wide range of housing types and locations. This should include both Brownfield and Greenfield land. In the Submitter's view, this will provide the best opportunity to ensure suitable housing supply, the provision of housing choice and a competitive land market.

15. The Submitter supports the NPS-UD and intent of the FDS approach generally. It is important that Local and Unitary Authorities operate with a long term planning horizon to ensure that sufficient suitably live zoned land is made available to meet the short, medium and long term needs of the community.

16. The Submitter opposes the FDS being embedded into the Regional Policy Statement to restrict plan changes in FUZ. This will remove opportunities for advancing the urbanisation of land, where that can address housing needs and where issues such as the provision of infrastructure have been resolved.

Further analysis, consultation and engagement is required before the FDS adopted

17. The Submitter notes that under clause 3.15 of the NPS-UD, the Council is required to engage with a range of parties to prepare a draft FDS, including other relevant councils, central government, hapū, and iwi, infrastructure providers, and the development sector. The broader requirements in Policy 10 require the Council to *"engage with the development sector to identify significant opportunities for urban development*". Engagement with the development sector is also required to identify infrastructure requirements.

18. The Submitter considers that the Council has not complied with its requirements under clause 3.15 of the NPS:UD and Policy 10. Based on the information provided by the Council the following consultation was undertaken prior to notification of the draft FDS:

    (a) a survey was sent to property developers on the Council's database to understand developer trends and future intentions[1]; and
    (b) the Council engaged with The Property Council.

[1] We understand that the survey was sent to people who had recently lodged a building consent with the Council.

19. The Submitters are a key stakeholder in the development sector in Auckland. The Submitter were not sent a survey or provided an opportunity to engage or contribute to the FDS. The Submitter is unable to identify any property developers who were surveyed by the Council. It does not appear that the Council surveyed a large proportion of developers in Auckland.

20. The Submitter considers that the FDS should be withdrawn and reconsidered following meaningful consultation with the development sector and landowners in the FUZ. It should also be delayed pending the central government elections, the review and approval of Plan Change 78 and the completion of the business land capacity study.

21. In preparing an FDS in accordance with clause 3.15 of the NPS:UD, local authorities must use the special consultative procedure in section 83 of the LGA.. Section 83(1)(d) of the LGA provides that the Council must "*provide an opportunity for persons to present their views to the local authority in a manner that enables spoken interaction between the person and the local authority ...".*

22. Based on the information available on the Council's website, the Council is proposing to make changes to the FDS in response to written feedback and adopt the FDS in late 2023 without holding a public hearing. This approach is entirely inconsistent with the LGA. While the Council belatedly provided for one day for feedback, this invitation was not sent to The Submitter(or a number of large developers) and the limited dates that were provided were already fully booked.

23. The special consultative process is generally applied to matters that have high significance to the community and may have major implications. As set out above, the FDS will have a material impact on growth and development in the Auckland region. Developers, and the public generally, deserve to have their concerns heard and understood. This right under the LGA has been recognised in other regions across New Zealand including in Nelson (where hearings were held in April 2022 on its FDS) and Rotorua (where a hearing is scheduled for August 2023).

24. The Submitter requests the Council schedules a hearing on the FDS in accordance with the LGA to enable all persons who provided feedback with the opportunity to be heard (as required by section 83(1)(d) and (e) of the LGA).

25. The Submitter notes that limited changes can be made through the Special Consultative Process without triggering the need to re-consult. Effective pre-engagement is therefore needed. The Submitter considers that independent hearings are required to consider the evidence.

Residential Capacity

26. The Submitter considers that the draft FDS significantly overstates the ability of the existing urban environment to meet the housing needs of the Auckland community. The FDS is essentially relying on all of Auckland's future housing stock deliverability to be provided through infill development.

27. The FDS analysis appears to be based on plan-enabled capacity. The Submitter considers that there is a need to consider "*feasible and reasonably expected to be realised*" capacity by location and type.

28. There are many reasons why existing urban land may not be suitable for redevelopment. This includes the circumstances of the land owners, the existing capital investment on the land that makes redevelopment cost prohibitive, and the lack of suitable infrastructure capacity.

29. Noting the current recession and uncertainty in the housing market, a slowdown in the availability of greenfield land for housing development will result in a significant reduction in general housing stock availability. Whilst the length of recession is unknown, the current FDS will likely contribute to significantly lower housing availability and further delays in housing deliverability, and increased house prices over the short term.

30. Despite the assertion that the MDRS will significantly increase infill housing supply, The Submitter notes that since 2016 most of urban areas in Auckland have been able to develop 1-3 dwellings as a permitted activity. Despite this opportunity, the share of Auckland's dwelling growth that has been delivered by these smaller permitted activities is considerably less efficient than larger multi-unit developments and greenfield neighbourhoods. The Submitter has significant doubts that the MDRS will deliver a larger percentage of growth than the present situation.

31. The draft FDS will result in a significant reduction in available housing capacity, with no economic assessment of the overall flow on effects from removing or delaying such large areas of FUZ land. The Submitter notes that infill and redevelopment housing is generally 20-30% more expensive to build than greenfield housing. The reduction in land supply will place ongoing upward price pressures on houses, as experienced in Auckland since the introduction of the AUP in 2016.

32. The FDS targets urban growth only at Red Hills, Tāmaki; Mangere; Mt Roskill. These are very largely identified as the Kainga Ora redevelopment areas. These locations are too confined and will not provide for the necessary breadth of growth; and too limited in the geographic spread in terms of where people desire to live, and the breadth of lifestyle choice that people seek.

33. The Submitter notes that the Auckland Council has obtained a further 12-month extension for implementation of the MDRS under Plan Change 78. We understand that the primary reason is the uncertainty of the ability to intensify some existing urban areas due to the recent flooding events. There is significant uncertainty as the extent that these recent weather events will reduce the development capacity in the existing urban areas. The Submitter considers that it is premature to undertake changes to the FUZ (including staging) until Plan Change 78 has been approved.

34. The Submitter also notes that the FDS proposes to remove areas of FUZ, but there is no indication that the Council has considered areas outside the FUZ to address this reduction of land.

Constraining land supply directly impacts housing affordability

35. The key lesson of the 2000's and mid-2010's is that constraining land supply raises land value expectations in the current owners, which in turn raise the price developers need to pay for the land, which, when passed on to the end resident, significantly raises house cost. Under supply of land distorts normal market operations.

36. It is not the developer who is making the significant value uplift. Developer margins have been reasonably constant. It is the distortion in the market that raises hope value amongst existing

rural and urban landowners, because there is a critical land supply shortage. A healthy over zoning is an important method to ensure these distortions do not occur.

37. It is also important to note that the build cost for 2-3 storey attached housing typologies and 3-5 storey apartments contemplated in brownfields environments under this policy are significantly more than traditional detached 1 & 2 Storey homes commonly found in greenfield developments. Therefore, eliminating greenfield will only lead to negative impacts on housing supply and affordability will only get worse.

38. One of the key unintended consequences of the FDS is that it will significantly constrain land supply, which will have a further negative impact on housing affordability.

39. This is completely at odds with direction from central government through the NPSUD which directs Councils to provide "at least" sufficient capacity and aims to improve housing affordability.

Business Land Supply

40. The Submitteracknowledges that the FDS is not just about delivering homes and housing, but it is also about well-located opportunities for business activity and community facilities, to offer good accessibility to employment and a range of household needs in the urban setting. These are all relevant matters when considering Auckland's Future Urban Areas. The Submitter notes that this is particularly relevant in the Auckland context which is a polycentric city which comprises a number of metropolitan centres throughout the Auckland urban environment from the Albany Metropolitan centre in the north to the new Drury Metropolitan centre in the south[2]. Locating employment land close to where people live will help address congestion issues and greenhouse gas emissions.

41. The draft FDS confirms that about 1,400 hectares of additional greenfield land for business activities is required in the long term. This includes approximately 1,000 hectares of land for land extensive business activities and 400 hectares of land enabling business activity and mixed use in centres and business areas. The land will mainly need to be accommodated in the Future Urban Zoned locations and these is an opportunity to ensure that such business land is also aligned with future housing and community infrastructure to provide the opportunity for people to live, work and play in their particular community. The lack of land use integration of both employment land and housing will lead to the reinforcement of cross regional transport demand which will exacerbate travel times, congestion and result in increased greenhouse gas emissions.

42. The Submitter considers that meaningful intensification of the existing urban area is an unrealistic option for industrial development, particularly for land-extensive floorplates. Provision for most of this growth will need to be in greenfield locations. The capacity alleged in the FDS is based on incorrect assumptions as to vacant land and an unrealistic assumption that brownfield business sites can be redeveloped at very high density. Some of the key assumptions in the draft rely on multi-story industrial development and very high building to land efficiencies. The assumptions are optimistic and need to be tested. The end result appears to be an over estimation of the available business land capacity s at present and an under-provision over the 30-year period.

[2] There 11 metropolitan centres across Auckland: Albany (emerging), Takapuna, Westgate (emerging), Henderson, New Lynn, Newmarket, Sylvia Park (emerging), Botany (emerging), Manukau, Papakura and Drury (emerging), plus the City Centre.

43. There is a significant undersupply of industrial land at the current time, even before further constraints are imposed as proposed in the FDS. Market research indicates that there is a substantial undersupply of large vacant industrial sites, particularly in the north-west of Auckland, yet the draft FDS proposes no new greenfield development in this part of the region until at least 2035+. That provision will fall short of the Council's land supply obligations under the NPS-UD.

44. The Submitter also notes that the Business assessment is not complete. This is a fundamental part of the evidence base that needs to be completed to inform the FDS. Without an adequate supply of employment land, Auckland risks reducing its competitiveness and business will relocate outside of Auckland.

45. The FDS should be delayed until this work has been completed.

FDS Identified Site Constraints and Flooding Matters

46. The FDS cites that there are a number of statutory and non-statutory documents that support the concerns raised in the FDS as reasons why growth in the FUZ should be slowed and further assessments completed. The includes documents like The *National Policy Statement for Freshwater Management 2020* which deals with sensitive hydrological spaces, inclusive of wetlands and streams. Sediment and erosion are controlled by consent conditions and Council's own GD-05 standards. The recent flood events have been identified as one of the reasons *to* prevent greenfield development due to several stated constraints.

47. The Submitter disagrees with the approach. The existing planning documents already provide a pathway and a consenting framework to address such matters. In any event, the potential for enhanced regulatory methods (i.e., even better stormwater performance requirements) should have been considered as options. It is also noted that the requirement for structure planning and an eventual Plan Change provides more than sufficient controls to ensure that site constraints (including Natural Hazards) are identified and suitably addressed.

48. The Submitter considers that there is ample opportunity (and land) to masterplan developments to manage natural hazards and stormwater issues and, as noted above, there are already sufficient controls within the Unitary Plans to manage such effects.

49. The Submitter also notes that it is likely that additional qualifying matters, such as flooding, would prevent or delay development under the MRDS until this aspect of development was resolved. The current uncertainty around the final outcomes of Plan Change 78 and the MDRS (including the 'theoretical yield') further highlights the lack on certainty of the ability for the Policy framework to provide suitable housing choice to the Auckland community.

50. The Submitter is of the view that density done well, designed in an integrated manner from the outset with good modern infrastructure standards, is far superior to ad-hoc and fragmented infill in older, often car-orientated neighbourhoods with very poor infrastructure.

Governmental Uncertainty

51. The Submitter notes that the National party has signalled that it will likely make the MDRS "optional". There is current significant uncertainty as to whether they will continue to support and deliver the capacity envisaged under the MDRS. Should the approach to the MDRS change

Council will be left with a FDS that serves a limited purpose and provides for a watered-down infill approach relying on infill uptake much like we already have under the AUP, but with a diminished ability to bring in greenfield land.

Infrastructure Services and Funding

52. The FDS assumes that only the Council will fund core infrastructure. This is not correct, and on many projects the developer funds and delivers the infrastructure. The infrastructure triggers in the FDS are unclear and appear to assume that all infrastructure needs to be delivered before rezoning occurs. This is also unrealistic as the private sector will not invest in the absence of certainty about land use outcomes, as it is the approval of land use that enables developers to secure funding for the infrastructure. The Council is very unlikely to be in a position to fund the required infrastructure and it needs to work in partnership with the private sector to deliver the infrastructure and land use outcomes required.

53. The Submitter considers that providing infrastructure in the FUZ integrates suitably sized infrastructure from the beginning. Because it is a 'clean slate', there is an opportunity to design and size infrastrucure within the context, use the land effeciently and maximise development, and the investment that the Council makes. For existing communities on the urban/FUZ interface, greenfield development may enable additional critical mass and additional economic support for their local neighbourhoods.

54. The Submitter notes that in terms of greenfield areas, on site infrastructure is generally funded by developers. Offsite infrastructure to meet the demands of growth is largely funded in accordance with an approved Developer Contribution Policy or other approved funding framework.

55. The Submitter considers that the FDS significantly underestimates the costs and feasibility for retrofitting infrastructure into existing brownfield areas. There are also significant issues with the ability for developers to obtain a "rights of entry" to access infrastructure on private land. This issue already frustrates intensification under the current Unitary Plan provisions and it will not be addressed by PC78.

56. There is very little mention of development contributions as a means to resolve funding shortfalls often cited in the FDS, notwithstanding large-scale development proposals almost always (via the Plan Change Process) incorporate transport and infrastructure upgrade triggers as part of any successful rezoning. We can only presume that the Council has no appetite to contribute any funding to future FUZ developments in the short to medium term, hence why this option has been almost entirely discounted from the FDS. Developers have (for some time) successfully shared the cost of greenfield redevelopment in previously identified FUZ areas – through both standard development contributions required under conditions of consent, and/or by infrastructure growth agreements with services providers.

57. The Submitter consider that where infrastructure investment has occurred, those areas should be prioritised so that a return can be obtained from the funding that has already been invested. For example, Council and its CCOs have invested $181m for the Northern Interceptor bulk wastewater line and North Harbour 2 watermain, both of which are required to service the Whenuapai area. Another example is Drury South.

Conclusion

58. A quality FDS will support economic competitiveness over the next 30 years. To prepare the draft FDS, the NPS-UD requires engagement with the development sector (to identify significant future development opportunities and infrastructure requirements) (clause 3.15).

59. This is needed because developers ultimately implement the FDS – providing for growth in the wrong locations means supply will fall short of demand with flow-on effects for housing affordability and business productivity.

60. The FDS seeks to promote long-term strategic planning by setting out the means by which a local authority intends to achieve a well-functioning urban environment, provide sufficient development capacity over the next 30 years, and integrate planning decisions with infrastructure planning and funding. This is intended to enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

61. There are significant omissions in the Draft FDS with the exclusion of the existing and future urbanisation occurring at Whenuapai and Hobsonville.

The submitter's concerns would be addressed if the draft Future Development Strategy was amended in the following way:

- That the current FDS is withdrawn for the reasons set out in the following feedback and the Council meaningfully engages with the community and key stakeholders to reconsider the approach to the FDS.

- That the future urbanisation of 24 Bristol Road is accurately captured in any eventual FDS document, and is noted as development ready land, with a proposed timing of 2025+.

- That no changes are made to the FUZ (including staging) until Plan Change 78 has been approved.

- The FDS should be delayed until the Business Capacity Assessment has been completed.

- The Council should work with the community and key stakeholders, including the residential development sector, to develop key principles including:

  (i) that sufficient land must be released at the appropriate time to cater for growth;

  (ii) that land supply will continue to occur with a combination of urban consolidation, greenfield development, and the expansion of satellite townships;

  (iii) that growth needs to be serviced by adequate infrastructure, with a range of funding options explored including innovative methods and participation by the private sector (investment and development);

(iv) that stormwater and flood plain management are important factors and need to be considered in the release of land, but recognising different appropriate methods to manage such land;

(v) That these principles are applied on an area by area basis to identify the release of land;

(vi) ensure there is sufficient continuous release of employment and residential land to cater for growth;

(vii) enable and support the private sector to deliver the range and quality of urban growth that is good for the community and which the NPS-UD and RPS aspires to achieve;

(viii) retain changes to the RUB as a district control matter.

- Any consequential changes where these are required to give effect to the relief outlined above.

The Submitter appreciates the opportunity to provide informal feedback on Auckland Council's draft Auckland Future Development Strategy 2023-2053 and thanks the Council staff and elected members for their time in considering the matters that have been raised in this submission.

The Submitter would welcome contact from staff in the FDS team if any clarification or further information is required.

Date: 31 July 2023

Address for service of submitter:

Attention:

Telephone:
Mobile:
Email:

Future Development Plan 2023 #8275

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Other

Tell us why

In conclusion, this submission strongly advocates for the recogniθon of an urban node near Diary Flat area in the FDS, and for maintaining the subject site's development strategy as outlined in the Auckland Future Urban Land Supply Strategy July 2017. Acknowledging urban

development as a natural, organic process is in line with contemporary urban design methodologies, which cauθon against short-circuiθng and overlooking exisθng urban growth. This approach not only reflects democraθc principles by acknowledging ciθzens' desire to live

and work closer to the city centre, but it also aligns with staθsθcal data on projected populaθon growth.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

Please see attachment

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

Please see attachment

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why

This submission emphasizes the necessity of democraϴc input in highlighϴng the existence of significant urban node near Dairy Flat. Dairy Flat lies about 11km from the Albany urban node and forms an integral part of the urban fabric strengthening the connecϴon to the Whangaparaoa

peninsula. More urban nodes need to be recognized between Warkworth and Albany, parϴcularly in the interest of achieving the FDS's primary goals of sustainability and reduced travel ϴmes. Ignoring this reality would result in the majority of Rodney's growing populaϴon being expected to commute excessively long distance to the nearest urban nodes, a scenario that undermines the fundamental objecϴves of the FDS.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please see attachment

#8275

The Growth & Spatial Strategy Team

Auckland Council

Address: [redacted]

Email: futuredevelopmentstrategy@aucklandcouncil.govt.nz

To Whom it may concerns,

Draft Future Development Strategy Feedback Submission

Subject: Adherence to Subject Site Development Strategy as Projected in the Auckland Future Urban Land Supply Strategy, July 2017

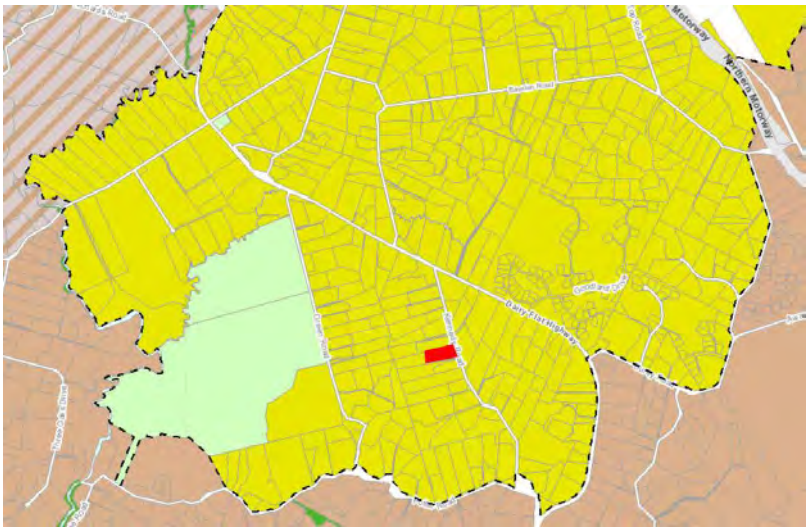
Subject Site Information

Address: [redacted]

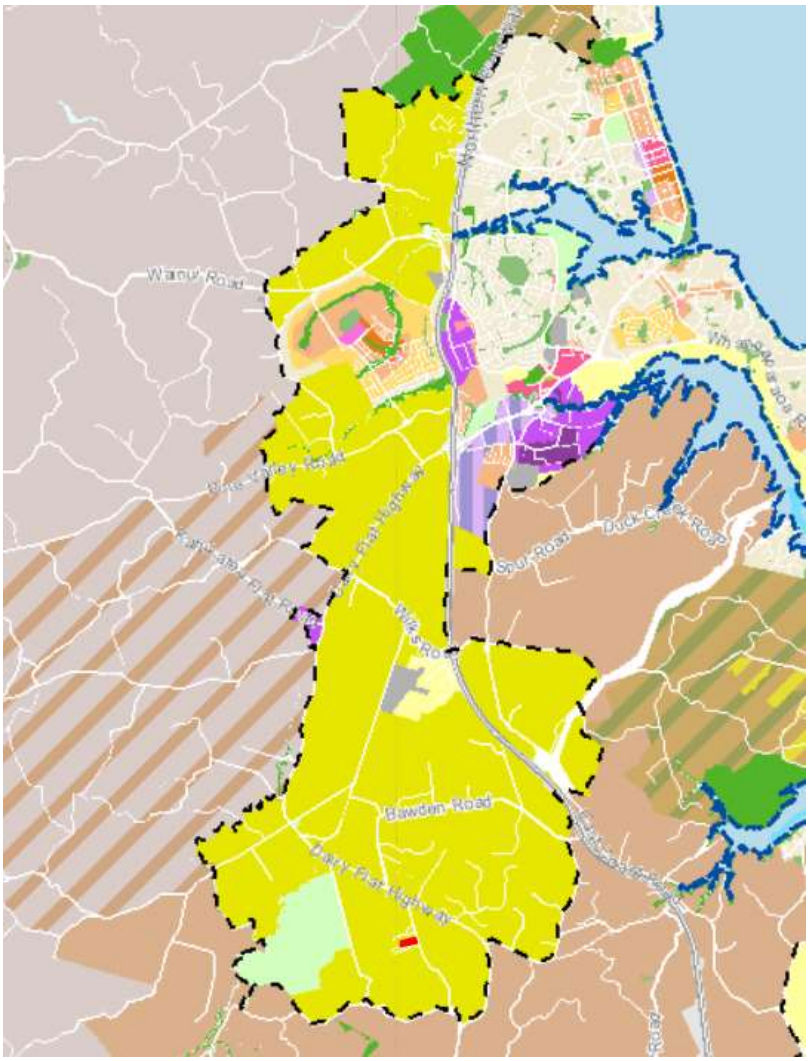
Planning Context:

1. Current Site Zoning

   The existing zoning classification under the Auckland Unitary Plan places the subject site within the Future Urban Zone, signifying that the area is earmarked for future urban development.



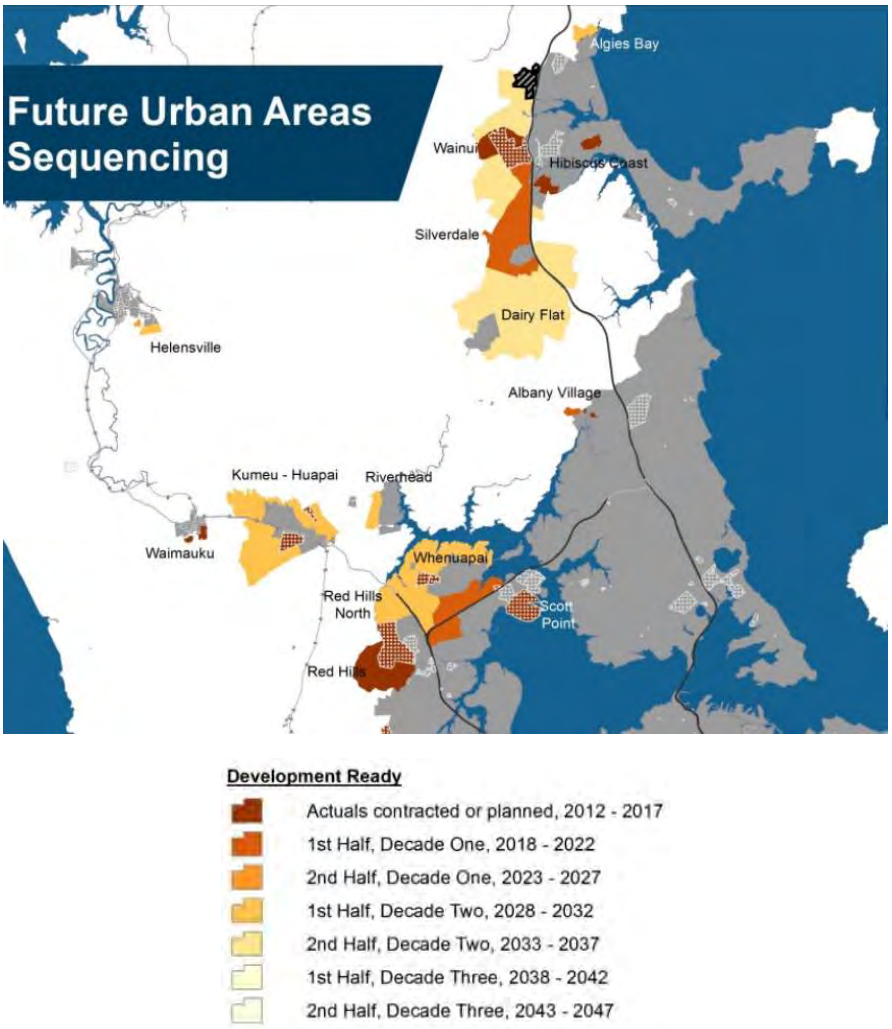
Subject site (red block) as shown in Auckland Unitary Plan



Subject site (red block) as shown in Auckland Unitary Plan

2. The Auckland Future Urban Land Supply Strategy (FULSS) July 2017

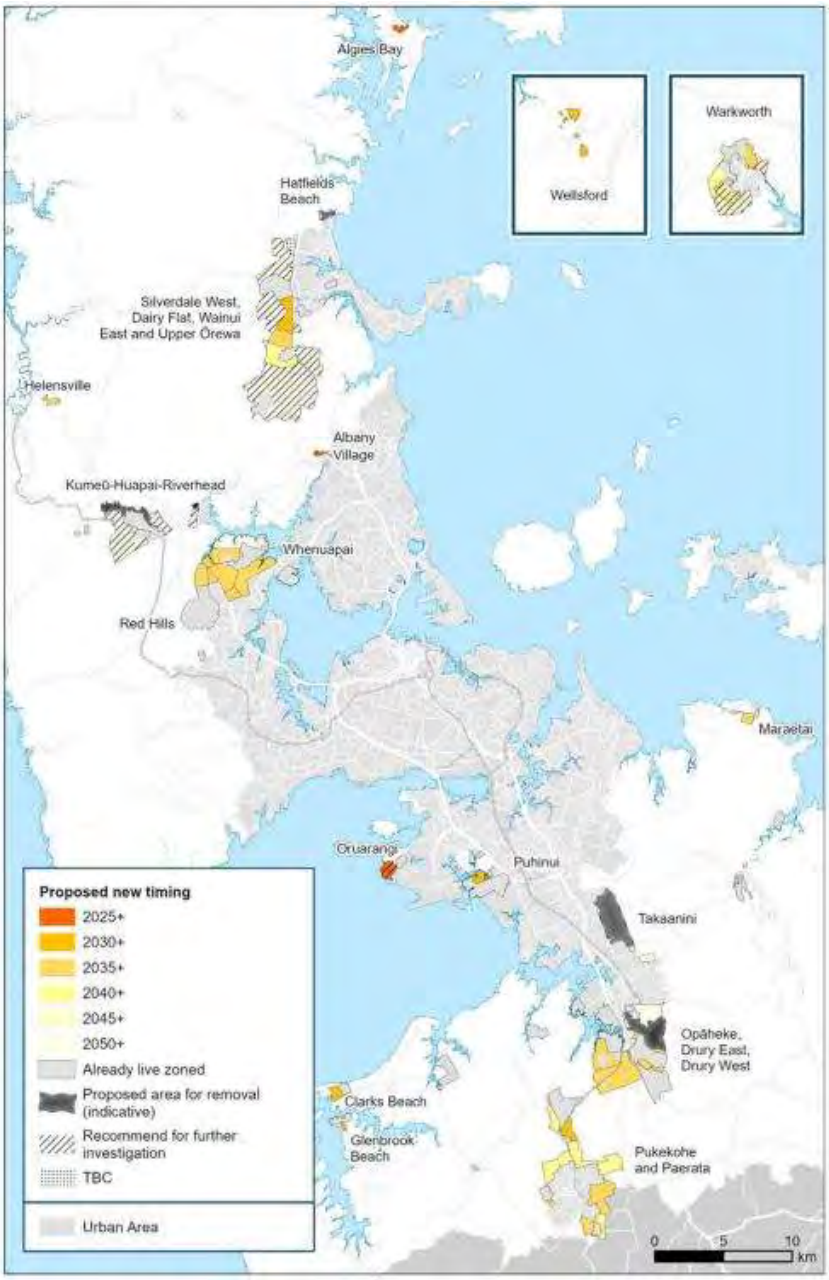
   According to the Auckland FULSS of 2017, the subject site is anticipated to be suitably equipped for development during the period of 2033-2037. This projection is based on an array of factors including regional growth, infrastructure plans, and market trends, among others.



Abstract from Auckland Future Urban Land Supply Strategy (FULSS) July 2017

3. Draft Future Development Strategy (FDS) Designation

Under the Draft Future Development Strategy, which is the primary focus of this submission, the subject site is classified as 'Recommended for further investigation'. This suggests that the site holds potential for future urban development, although further studies are required to determine its viability and the most appropriate land use considerations.



Proposed new timing of the Draft Future Development Strategy

Overview of the Draft Future Development Strategy

The Draft FDS lays down a clear direction favouring intensification of existing urban areas over greenfield or edge-of-network developments. It posits that, as a rule of thumb, urban expansion and new greenfield developments generate higher emissions and place greater demands on infrastructure than further developing existing urban areas. From an economic perspective, intensifying development within the established city boundaries is regarded as the most efficient approach.

The strategy acknowledges that Auckland is growing more rapidly than predicted, largely due to privately initiated plan changes that have accelerated the enactment of the FULSS. These changes have resulted in the activation of approximately one-third of the land originally intended for 30 years of growth, extending from 2017 to 2047.

In light of the finite resources for infrastructure, as well as recent significant challenges such as the pandemic and extreme weather events, the Council has put forth alterations to the urban development plan last updated five years ago.

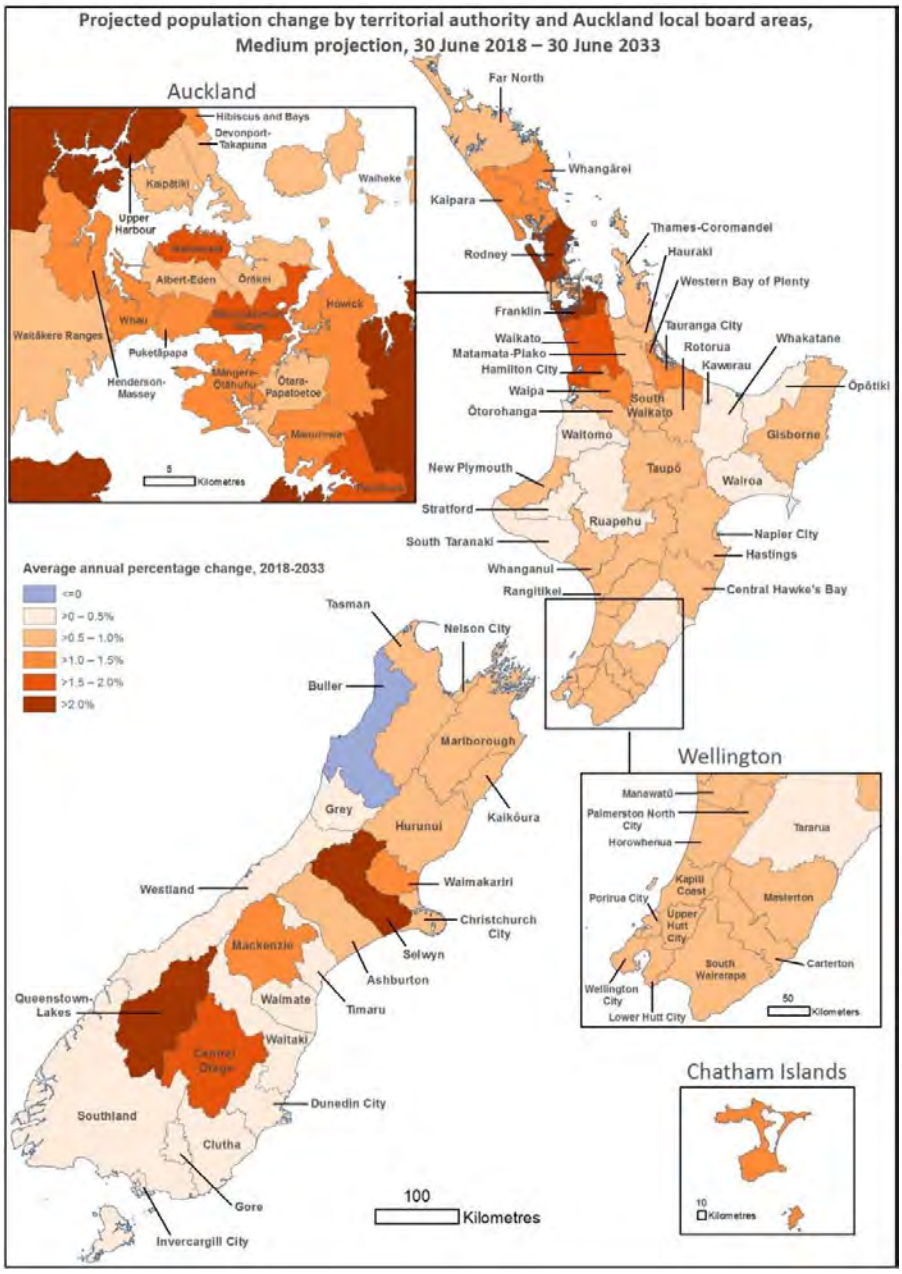
Reasons for Submission

With the subject site being classified as 'Recommended for further investigation' in the Draft FDS, this submission is aimed at articulating a viewpoint that supports maintaining the development strategy for the subject site as per the vision outlined in the Auckland Future Urban Land Supply Strategy, July 2017. This standpoint is based on the following reasoning:

1. Projected Population Growth

   As per Stats NZ data, out of the 21 Auckland Local Board Areas (ALBAs), 13 are predicted to experience growth rates exceeding the national average of 0.8% per year over a 30-year period (2018–2048) based on medium-level projections. The Rodney area, where the subject site is situated, leads this growth forecast with a projected rate of 2.3%.

   Dairy Flat, being a part of Rodney, is geographically the closest to the Albany urban node. Existing developments in the vicinity of the subject site already house substantial economic activities bolstered by surrounding population centres and residential areas. Therefore, it is reasonable to consider Dairy Flat as a potential urban node, and to expect a substantial portion of Rodney's projected population growth to gravitate towards this area, which is nearer to the Auckland city centre compared to other parts of Rodney.

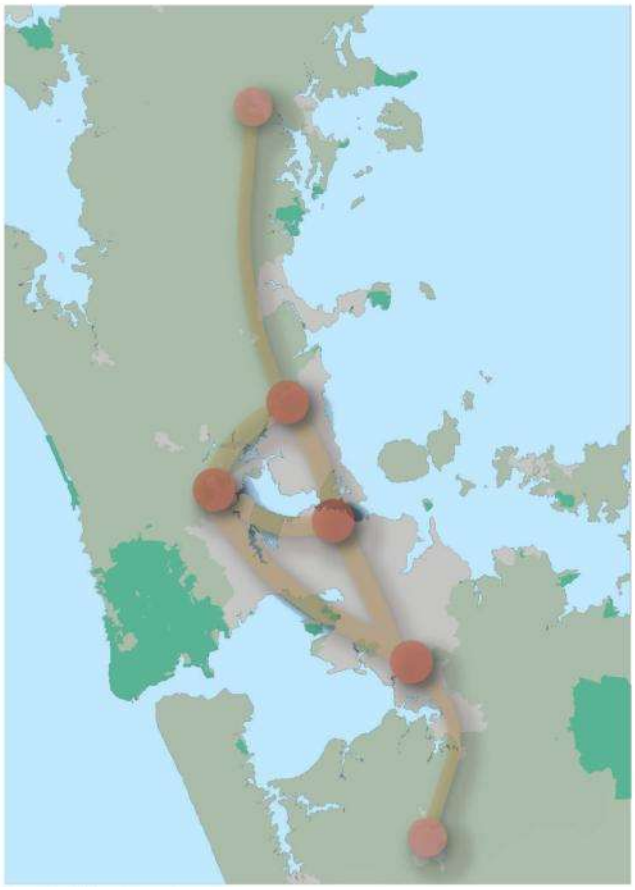


Auckland population growth projection from Stats NZ

2. Urban Design Nodes and Traffic Flow

The Draft FDS is underpinned by a focus on developing urban nodes throughout Auckland's expansive geographic span. It confirms that Auckland will continue to move towards a multi-nodal model where a total of six nodes are recognized within Auckland's boundaries.

In this model, only two nodes, Albany and Warkworth, are located in the northern portion of the city. Additionally, these two nodes are separated by approximately 40km of motorway, in stark contrast to the rest of the city where nodes are spaced only 10km to 25km apart. This spatial distribution first introduced in 2018 is at odds with Stats NZ's projections, which predict that the Rodney area, where Dairy Flat is located in, will experience the highest rate of population growth in the city.



Multi-nodal model referenced by the Draft Future Urban Strategy

This submission emphasizes the necessity of democratic input in highlighting the existence of significant urban node near Dairy Flat. Dairy Flat lies about 11km from the Albany urban node and forms an integral part of the urban fabric strengthening the connection to the Whangaparaoa peninsula. More urban nodes need to be recognized between Warkworth and Albany, particularly in the interest of achieving the FDS's primary goals of sustainability and reduced travel times. Ignoring this reality would result in the majority of Rodney's growing population being expected to commute excessively long distance to the nearest urban nodes, a scenario that undermines the fundamental objectives of the FDS.

3. Consistency of the Development Strategy

   While this submission recognizes the challenges and necessary adaptations of the development strategy over the past five years, it also stresses the importance of acknowledging the commitments made by developers who have invested in Auckland's future by land banking in anticipation of the Council's vision. These investments have become significant stakeholders in the Future Urban Zones as a result of their alignment with the FULSS.

   Over the years, the Council has approved numerous private plan changes that have led to the activation of about one-third of the land slated for development over the next 30 years. If the Council were to retract its strategy due to unanticipated challenges, failure to adhere to its initial plans, or efforts to balance the development scales, the consequences could deter future investment and stifle real development.

   As such, this submission proposes that the Council give due recognition to the existing node around Dairy Flat and adhere to the development timeframe envisaged by the FULSS.

Conclusion

In conclusion, this submission strongly advocates for the recognition of an urban node near Diary Flat area in the FDS, and for maintaining the subject site's development strategy as outlined in the Auckland Future Urban Land Supply Strategy July 2017. Acknowledging urban development as a natural, organic process is in line with contemporary urban design methodologies, which caution against short-circuiting and overlooking existing urban growth. This approach not only reflects democratic principles by acknowledging citizens' desire to live and work closer to the city centre, but it also aligns with statistical data on projected population growth.

Best Regards,



Future Development Plan 2023 #8297

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Agree

Tell us why

BNH agrees with this approach as reducing the spread or sprawl of the city will enable future development to utilise and improve existing infrastructure which is usually more cost-effective than building new infrastructure. Additionally, this approach should secure more greenfield areas for leisure use to support more peoples' health and wellbeing as the population grows. That said, this strategy will only be successful if the planned intensification is adequately served by the provision of all the necessary and purpose-built infrastructure required to achieve the desired outcome of enhancing current urban areas sufficiently to enable Aucklanders to live, work and enjoy leisure activities in their local communities.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Agree

Tell us why

BNH agrees with this approach because as stated, it will assist in reducing the need for excessive travel between home, work and leisure activities, thus helping to meet any climate action targets and supporting people to have a sense of belonging in their local community. For the desired outcomes to be achieved it is imperative that adequate and suitable infrastructure is provided to enable people to utilise alternate travel modes and that adequate, affordable public transport is also available if Vehicle Kilometres Travelled (VKT) are to be reduced by the amount required. BNH would also suggest that local campaigns to educate people about the availability of these alternate modes are undertaken as development is completed in individual communities, to encourage the behavioural change necessary to ensure the optimum use of the alternate modes available by local residents and employees, thus helping to reduce car dependency.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why

BNH agrees with this approach. The recent natural disasters which took such a heavy toll across the city have served as a reminder of the vulnerability of certain areas in the region. Unfortunately, for some businesses and households this initiative has come too late as they were unable to recover from the impact of these significant events. Many businesses owners and home owners are now living in constant fear of another significant episode as soon as it starts to rain which is unacceptable.
BNH would ask that the assessment of development-enabled vulnerable locations should be prioritised and any remedial work to mitigate the risks and help these communities to adapt be initiated as soon as possible, to support the businesses and households in these areas. BNH believes that this work should be undertaken prior to known areas constrained by significant natural hazard risk being assessed for future development.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

BNH agrees in principle with this approach provided that there is still sufficient investment in the day-to-day infrastructure that intensified urban communities require. 'Traditional' infrastructure to provide clean water, remove stormwater and waste water, along with the necessary roading and alternate mode pathways must also be provided. BNH believes that a balance between the nature-based approach and the current approach to infrastructure investment needs to achieved to provide the best outcomes for current and future communities.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

BNH acknowledges the intent to prioritise investment in parts of the region that need it most to address disparities and serve communities of greatest need. We would however ask that development opportunities, particularly business development, are not dismissed in other areas where local communities would derive benefit from any such development.

BNH welcomes the statement in the Consultation Document Principle 5(c) acknowledging the inequities in the distribution of business land and the commitment to protect business sites to provide for long-term business needs.

BNH also acknowledges the statements on page 31 of the same document indicating that there is sufficient region-wide plan-enabled business capacity, although there are likely to be some shortfalls in the short to medium-term. BNH would ask that the provision of additional business-zoned land in the medium to long-term plans be brought forward to mitigate this risk.

BNH supports the recognition of Albany as one of the four identified sub-regional development nodes aimed at generating increased employment opportunities, bringing housing and jobs together.

Overall BNH supports the approaches outlined in Auckland's Future Development Strategy. However, we would respectfully point to the various caveats to that support in this submission which we would ask Council to make note of and give due consideration to as future development decisions are made.

Should there be any questions or other matters arising from this submission, we would be pleased to respond to these.

#8297

Submission: Auckland's Future Development Strategy

24th July 2023

Business North Harbour Incorporated

[redacted]

Local Board Representation: Upper Harbour Local Board

#8297

24th July 2023

Auckland Council
Attention: Future Development Strategy
Freepost Authority 190153
Private Bag 92300, Victoria Street West
Auckland 1142

futuredevelopmentstrategy@aucklandcouncil.govt.nz

Submission to Auckland**'s Future Development Strategy**

Auckland Council is seeking feedback on Auckland's Future Development Strategy.

Introduction

Business North Harbour (BNH) representing the North Harbour Business Improvement District welcomes the opportunity to make this submission on Auckland's Future Development Strategy.

BNH is a significant commercial and industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 37,000 Auckland residents and ratepayers. The organisation is located within the Upper Harbour Local Board area, which remains one of the fastest growing areas in the country, in both absolute and percentage population terms, which brings both challenges and opportunities to the North Harbour business district.

BNH represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations, representing sectors such as ICT, business services, specialist manufacturing, light – medium warehousing, logistics, retail and hospitality. In addition, we have key educational institutions within or on our boundary, including Massey University Albany and AUT Millennium, along with a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand.

Background

Auckland Council has commented:

That the Future Development Strategy (FDS) sets out the big picture vision for how and where we should grow over the next 30 years to achieve the best outcomes for Tāmaki Makaurau.

There has been a lot of change recently. Central government introduced legislation for more housing intensification across the city. The effects of climate change are being felt more frequently, as seen by the Auckland Anniversary floods and Cyclone Gabrielle. We also have a commitment to halve our greenhouse gas emissions by 2030 and reach net zero emissions by 2050. The way we grow and develop should improve the environment, avoid hazards and help address the impacts of climate change.

This changing context means we need to update our strategy for how the city grows in the future. There are many ways cities can grow. We propose that most new housing and business development be in the existing city near town centres, good public transport services and jobs, rather than spread out across the region. Focusing growth in our existing urban areas, rather than more growth on the edges, results in improvements to the environment, the economy, and people's wellbeing.

We would like your feedback on our approach to how and where Auckland should grow and change.

BNH Feedback:

(1) Focusing Growth

Denser, more compact cities result in improvements to the environment, the economy and peoples' wellbeing. Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time. We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

What do you think of our approach to focus most of Auckland's growth in existing *urban areas?*

BNH agrees with this approach as reducing the spread or sprawl of the city will enable future development to utilise and improve existing infrastructure which is usually more cost-effective than building new infrastructure. Additionally, this approach should secure more greenfield areas for leisure use to support more peoples' health and wellbeing as the population grows. That said, this strategy will only be successful if the planned intensification is adequately served by the provision of all the necessary and purpose-built infrastructure required to achieve the desired outcome of enhancing current urban areas sufficiently to enable Aucklanders to live, work and enjoy leisure activities in their local communities.

(2) Accessible Local Centres:

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs. We propose focusing housing and business development near local centres where most peoples' daily needs are easy to access by walking, cycling and public transport.

What do you think of our approach to focus development near local centres?

BNH agrees with this approach because as stated, it will assist in reducing the need for excessive travel between home, work and leisure activities, thus helping to meet any climate action targets and supporting people to have a sense of belonging in their local community. For the desired outcomes to be achieved it is imperative that adequate and suitable infrastructure is provided to enable people to utilise alternate travel modes and that adequate, affordable public transport is also available if Vehicle Kilometres Travelled (VKT) are to be reduced by the amount required.
BNH would also suggest that local campaigns to educate people about the availability of these alternate modes are undertaken as development is completed in individual communities, to encourage the behavioural change necessary to ensure the optimum use of the alternate modes available by local residents and employees, thus helping to reduce car dependency.

(3) Avoiding Hazards:

As our climate changes, the frequency and severity of hazards such as sea-level rise and coastal erosion will worsen. Where and how we plan for growth and how we adapt to these hazards is increasingly important. We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate. Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

BNH agrees with this approach. The recent natural disasters which took such a heavy toll across the city have served as a reminder of the vulnerability of certain areas in the region. Unfortunately, for some businesses and households this initiative has come too late as they were unable to recover from the impact of these significant events. Many businesses owners and home owners are now living in constant fear of another significant episode as soon as it starts to rain which is unacceptable.
BNH would ask that the assessment of development-enabled vulnerable locations should be prioritised and any remedial work to mitigate the risks and help these communities to adapt be initiated as soon as possible, to support the businesses and households in these areas. BNH believes that this work should be undertaken prior to known areas constrained by significant natural hazard risk being assessed for future development.

(4) Resilient Infrastructure:

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology. Nature-based infrastructure, such as rain gardens, swales and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards as well as protect and restore the natural environment. We propose prioritizing investment in infrastructure that is decentralized, nature-based, regenerative and mauri-enhancing.

What do you think of our approach to prioritizing nature-based infrastructure that responds to the impacts of climate change?

BNH agrees in principle with this approach provided that there is still sufficient investment in the day-to-day infrastructure that intensified urban communities require. 'Traditional' infrastructure to provide clean water, remove stormwater and waste water, along with the necessary roading and alternate mode pathways must also be provided. BNH believes that a balance between the nature-based approach and the current approach to infrastructure investment needs to achieved to provide the best outcomes for current and future communities.

(5) Other Feedback:

Do you have any other feedback on our approach to how and where Auckland should grow and change?

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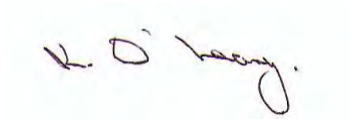
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Conclusion:

Overall BNH supports the approaches outlined in Auckland's Future Development Strategy. However, we would respectfully point to the various caveats to that support in this submission which we would ask Council to make note of and give due consideration to as future development decisions are made.

Should there be any questions or other matters arising from this submission, we would be pleased to respond to these.

Yours sincerely,



[redacted]
General Manager

Future Development Plan 2023 #8298

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Your feedback

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4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please refer the attachment

AUCKLAND COUNCIL

FUTURE DEVELOPMENT STRATEGY



SUBMISSION OF TE AHIWARU TRUST

	SIGNATURE	DATE
PREPARED BY [redacted]		
REVIEWED BY CO-CHAIRS		
APPROVED BY TE AHIWARU TRUST		

CONTENTS

MIHI / INTRODUCTION

WHAKATAKI / BACKGROUND

MANA WHENUA O TE AHIWARU

WHAKAHONORE TE TIRITI ME NGA WHAINGA

MIHI

Ko Hape te rangatira.

Ko Kaiwhare te taniwha.

Ko Mataoho te tupua.

Ko Puketaapapa, ko Waitomokia,

Ko Maunga Taketake, me Ootuataua ngaa maunga.

Ko Ooruarangi te awa.

Ko te Manukanuka o Hoturoa te moana.

Ko Makaurau te marae.

Ko Te Ahiwaru te hapuu.

I ngā wā o mua, kia tukuna mai ou mātou tūpuna ngētehi tino hiahia mo te mana motuhake o ngā whanau o Te Ahiwaru, Waiohua me te Marae o Makaurau. Te Tokowaru rau I ngā tau kia whaiwhaitia i ēra wawata mōna whakatupuranga.

Kia rātou ma, nei rā te mihi, Tēnā Koutou, Tēnā Koutou, Moe mai kia koutou katoa.

WHAKATAKI

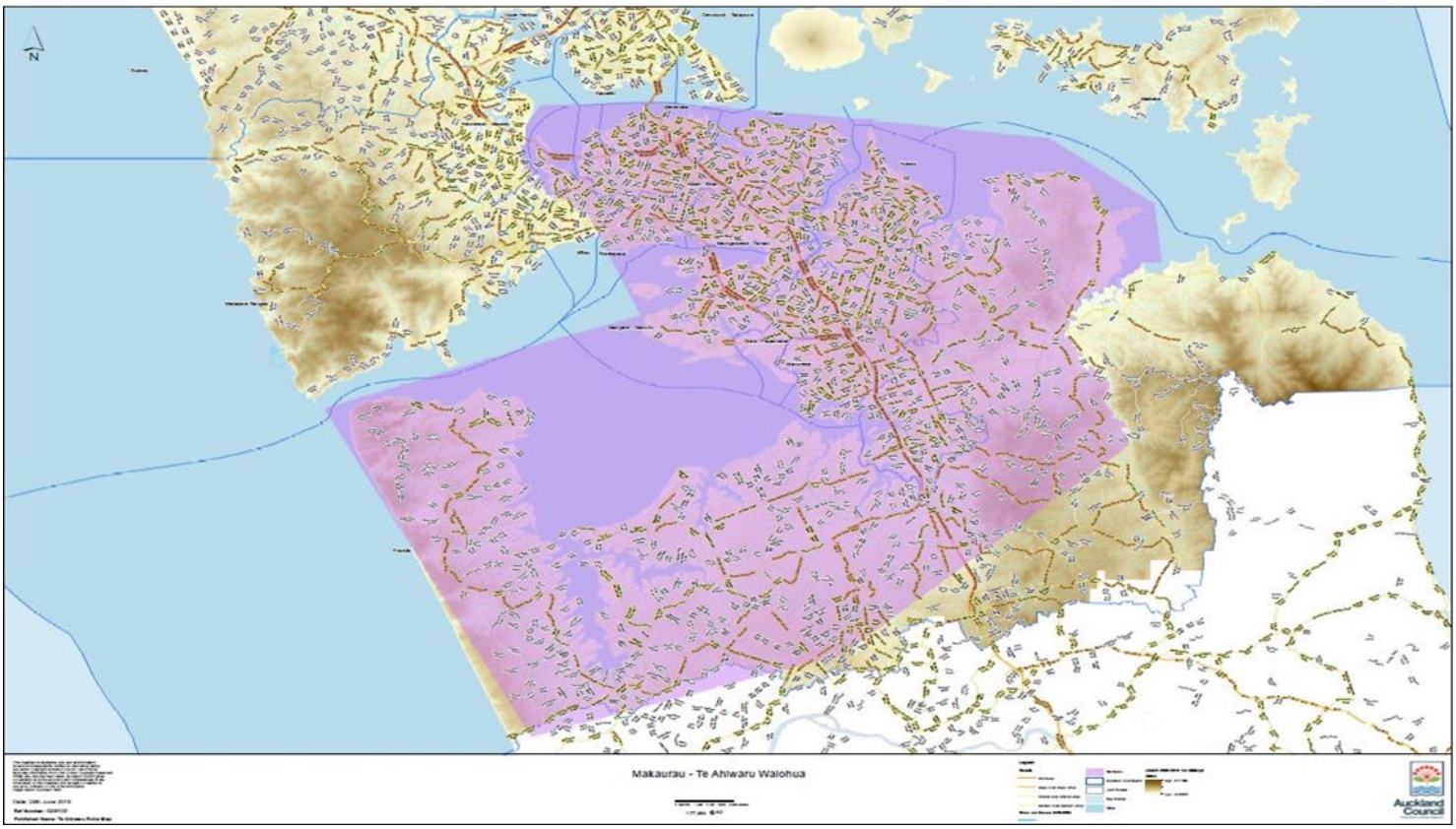
This submission to the Auckland council Future development Strategy is submitted by Te Ahiwaru Trust and on behalf of Te Ahiwaru hapuu of Waiohua / Waikato. The above pepeha identifies the locality of our turangawaewae (tribal hub) central to our entire mana a rohe (tribal area).

Our tribal register acknowledges over 800 beneficiaries living across the Auckland region. Cultural diversity is an evolutionary message that our mokopuna continue to embrace and they are the future well-being of our Iwi. Hononga I maarena mai ki Te Ahiwaru, Rarotonga, Kiripati, Niue, Hamoa, Iinia, Tonga, Haina, Hapani, Tararaa, Paakeha me rere tonu.

The submissions quantum for the Future development strategy offers little assurance to Te Ahiwaru and that the essential sections of the National Policy Statement for Urban Development would be adversely ingested, prompting the reactive mitigation of mana whenua groupings, rather than the proactive inclusion of Te Tiriti partnering. Auckland council's interpretation of Qualifying matters was inconclusive at the early stages of mana whenua engaging the NPS for Urban Development strategies at Regional Government levels. Therefore, thwarting the visioning exercises given the Resource Management Act and 3 Water reforms in processing a National Iwi co governing prospectus,

Whilst this feedback submission will respond to the target queries for Public opinion, Te Ahiwaru submission will address the aspiring intent and acquisitions of our iwi that trigger avoidance alarms and mitigable measure fundamental to the upkeep of Te Tiriti based relations and preserving the national importance of our culture and Te Ao maori environs.

TE MANA AA WHENUA O TE AHIWARU



WHAKAHONORE TE TIRITI ME NGA WHAINGA

Listed here as high level priorities for Te Ahiwaru iwi, the listed urban development values and aspirations of Te Ahiwaru are:

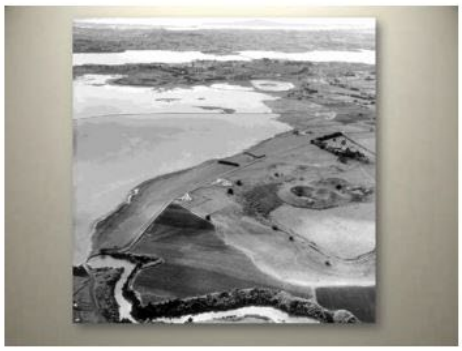
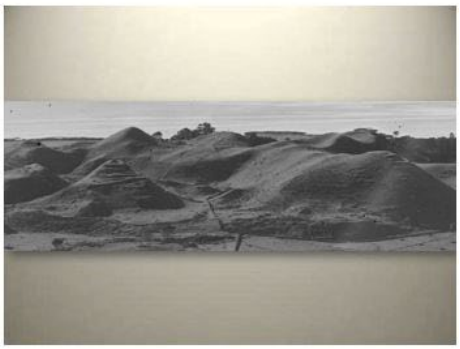
Mana Motuhake
The rights of Te Ahiwaru to appropriately lead Te Ahiwaru future vision, participation and developmental needs. i.e; Priority, Location, Pace, Methodology, Performance, and permanence.

Rangatiratanga
The rights of Te Ahiwaru to determine our leadership and their contributions to engagement strategy, consensus baselines, avoidance measures and mitigable terms for the health and wealth of Te Ahiwaru iwi.

Matauranga / Kaitiakitanga
The expectation of engagement to be valued, reflected, adopted expertly and inherently as the forever occupants of Taamaki Makaurau ki te Tonga.

Mauri
The acknowledgement that inappropriate urban development in our rohe affects Te Ahiwaru whanau and future generations mentally, physically and spiritually.

Manaakitanga
The recognition of mana a whenua for Te Ahiwaru korowai Manaaki. Our resources natural and intangible are the health of Te Ahiwaru and our support structure.

FUTURE DEVELOPMENT STRATEGY

Impertinent to Urban Development across Te Ahiwaru mana a whenua, feedback is focal to the following listed:

- FDS PRINCIPLES 1-5
- SCENARIOS A & B
- DEVELOPMENT CAPACITY DWELLINGS & BUSINESS

National transport influences over Auckland city are being applied in adhoc rushed evaluations. Example reference:

- Auckland light rail
- Southern Corridor

Challenges in addition to those verbally submitted on 15 Mar 18, as a result of Transport, NZTA, Auckland Transport, Freight forwarding, Ports, Rail, Buses, Cars, Ferry Services Infrastructure and Traffic Management

- Transport Movement and Infrastructure in and around Papakainga is not assessed on its impacts upon Maori Cultural Practices and Customs
  e.g; Te Ahiwaru at Makaurau Marae honor our deceased with a final walk over their lands from Marae to Urupa. The walking route goes through a main arterial route. To the general public this practice can be interpreted in two different ways; fascinating with a desire to capture the experience or morbidly with fear and disrespect.
- Public Transport Services are either absent or difficult to access around areas such as papakainga for Te Ahiwaru.
- Traffic Island systems and/or Road closure options are required to protect the integrity of papakainga as a significant site continually occupied.
- Transport infrastructure is obstructing accessibility and increasing the negative impacts of sediment runoff to our traditional food resource areas

- Auckland Rail Hubs and Frequent Bus Networks draw focus to businesses, town centers and retail hubs. A priority of the transport network is to reduce car omissions and increase public transport, cycle and walking shared paths to move people.
- New transport infrastructure is impacting on sustainability of Natural Resources including water quality runoff and groundwater tables.
- Existing transport infrastructure has ongoing issues with sub-standard low cost upgrades requiring regular maintenance and prolonged impacts to Natural Resources including water quality.

Recommendations – We do not support the regional fuel tax of 10 cents per litre. Due consideration should be sought to:

- Support our prioritization to protect Papakainga, cultural practice, traditional food resources and integrity with a clear assessment and pre-engagement strategy over (existing and potential, major or minor) transport projects and road infrastructure
- Give due consideration to our incentives for protection of Lands, Freshwater and Sea that we may deem necessary for the retention of our Te Ahiwaru culture and traditions, i.e; Safer streets, Road closure, Papakainga recognition signage, High quality water treatment devices near our traditional food gathering waterways.
- Support the objective of Rail and Frequent Bus Networks to move people. Shorten walking distances to frequent transport networks by designating residential zones closer to the public transport networks.
- Prioritise a consistency in Environmental gains across all transport projects and business cases (CapEx or OpEx) – Wetlands not Ponds, Vegetated swales and Raingardens. Functional and Aesthetic cohesion.
- Enlist a Quality Assurance and Key Performance Indicator Program of road construction contractors, incentivize innovative construction businesses who are working above grade.

Water Quality Improvements

Challenges as a result of Pollution to Aucklands harbours, beaches and streams. Network Discharges from development existing and proposed infrastructure and operations of Wastewater and Stormwater.

- Oruarangi Awa and its mother source the Manukau Harbour receive prolonged negative impacts as a result of inconsistent catchment management plans, water quality treatment methods and discharge consent variations of privatized and council managed facilities.
- The compartmental assessment of waterway interests continue to accelerate erosion issues to Papakainga and Urupa that are a priority to Te Ahiwaru
- Prolonged remediation support from Auckland Council and its partners have resulted in highly vulnerable statuses and delayed achievement of Traditional food resource areas Restore, Reseed and Regeneration initiatives intended by Te Ahiwaru.
- Auckland Council Healthy Waters Department and Watercare Services Ltd share the responsibility of qualitative and quantitative water discharges to Auckland's environment, they are working in isolation without regard to a holistic and co-operative approach to the value of Auckland's Natural water resources.
- Climate change is a very real and an inevitable challenge impacting on Auckland. Auckland is using and abusing more natural resources than it is restoring.
- Aucklanders attitudes toward Beaches, Harbours and Streams is borderline malevolent due to lack of understanding the impact of their behavior. Advocacy for the user pays and penalty fines, is not a sustainable measure of responsibility (Money cannot replace a lost resource)

Recommendations – We give partial support to the proposed target rate of $66 per year, pending due consideration is given to:

- Merge the Managing interests of Watercare Services Ltd and Auckland Council Healthy Waters Department to decompartmentalize the value of Aucklands water resources.
- Support the priority of Te Ahiwaru advocacy and aspirations as briefed at the Te Ahiwaru presentation before the Auckland Council committee (15 Mar 18) and provided in detail as Oruarangi Mauri Enhancement (appendix 1) for acknowledgement of Maori well-being, Belonging, Water quality improvement and submission to Auckland Council's Network Discharge consents from Te Ahiwaru.
- Invest in Te Ahiwaru kaitiakitanga responsibilities by resourcing and enabling co-developed education and employment growth of our people and procurement strategies with our partners.
- Support and provide accessibility of Te Ahiwaru and Community group efforts of restoration and maintenance.
- Support Auckland councils Environmental and Technical Services Team and their work toward Guidance Documents by progressing them into supportive legislation (i.e; GD01 and GD05).
- Prioritise high quality treatment of roofwater to recharge existing reservoirs and aquifers of Auckland for Auckland and minimize the dependency on outsourced watertakes i.e; Waikato River
- Support the merged assessment of catchment management planning and Industrial zone designations as an informative tool to deviate away from unmanageable water pollution scenarios
- Intensify information sharing of Aucklands positive and negative impacts on beaches, lakes, streams and their current state via television and social media

Regional Pest Management and Native species protection

Challenges as a result of Pest Management and Biodiversity:

- Te Ahiwaru endorse the minimisation of agro-chemical use in Pest eradication and are forced to compromise those values due to lack of council resources and new biosecurity issues.
- Auckland Council do not provide sufficient funds or opportunities to resource active kaitiakitanga roles in pest management, control and eradication.
- Monitoring and tracking biosecurity needs prompt isolation and follow up

Recommendations - we give support to option 3B, a $47 per annum increase toward Environmental Inititatives pending due consideration is given to:

- Improve the assessment criteria for ecological threat by endorsing a holistic land, water and sea impact assessment
- Support Rahui as and where necessary to assist in the isolation and remediation of ecological threats.
- Prohibit exotic flora and fauna sales in Auckland and New Zealand
- Proactively engage on existing and new data, tracking and monitoring kauri dieback and myrtle rust requires quick action

Questions relating to the Auckland Plan 2050

AN INCLUSIVE AUCKLAND

Auckland's Environmental prosperity is an imperative value across each of the focal areas of the Auckland Plan 2050. Without due consideration to the natural environment none of Auckland's Plan is sustainable.

BELONGING AND PARTICIPATION

Through an inclusive Auckland plan where Reo, Tikanga and Matauranga are shared, Aucklanders are encouraged to appreciate that centuries of Mana Whenua identity is sealed in the Auckland landscape. Unlike many others, this is the motherland that Maori connect and belong to, there is nowhere else for us.

Maori statistics are often stacked as a minority field against Pacifica collectivized as one. In terms of representation of individual cultures and diversity the balancing is inadequate. Pacifica fuses the collective of Samoan, Tongan, Fiji, Tokelau, Rarotonga into one though the cultural traditions are independently different. Auckland Plans utilize the information subjectively in various Local Board Plans. This does not represent “Taamaki Herenga Waka” in Te Ahiwaru opinion.

Future Development Plan 2023 #8299

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

Please refer to the attachment

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?



UDINZ Submission on Auckland Council's Draft Future Development Strategy (FDS) - July 2023

UDINZ

creating urban communities together

UDINZ Submission on Auckland Council's Draft Future Development Strategy (FDS)

SUBMITTER DETAILS FULL NAME:
Urban Development Institute of New Zealand (NZBN 9429047714335/Incorporation Number 50011540)

ADDRESSES: PO Box 963, Wellington 6011. Registered Office Address - UDINZ c/o Simpson Grierson, Level 27, 88 Shortland Street, Auckland Central, 1010, New Zealand

About the Submitter

The Urban Development Institute of New Zealand was formed in 2019 and was officially launched in 2020. It has a national board and currently has three chapters respectively in Auckland, Wellington and Christchurch, with further chapters in planning including an Otago Southland chapter based in Dunedin.

It has in excess of 120 organisational members from across the development ecosystem. UDINZ was formed with the intention of bridging the gap between the public and private sectors so as to remove barriers to quality urban development. We do this by bringing insights and industry together for the benefit of people and communities.

The intention is to share knowledge, international best practice and new technologies and increase transparency across the system to reduce uncertainty for all that are part of development processes. The objective is resilient, sustainable and healthy communities for all in Aotearoa. Around 86% of New Zealanders live in urban areas, but there is little consensus about what makes a "sense of place" in those communities. There are many contributing factors. UDINZ focuses on issues that its members broadly agree are relevant and compelling and in relation to which UDINZ can effect change. It aims to lead the development of an "NZ Inc" approach.



UDINZ:

- Defines and advocates for a new urban development paradigm for Aotearoa New Zealand;
- Provides an environment for the sector to work together including with central and local government agencies to build relationships and understanding that reduce uncertainty and increase consistency between policy jurisdictions, as well as aligning policy and implementation;
- Runs events that bring the sector together to discuss issues and facilitates collaboration around best practice- connecting and coordinating people working in urban development;
- Builds knowledge through provision of data, evidence-based research and domestic and international learning as well as case studies demonstrating different approaches and best practice; and
- Provides and supports talent development and training in areas particular to the advancement of good urban development.

Overarching comments

There are a range of views amongst the UDINZ membership about the merits of what is being substantively proposed in the Auckland Council Future Development Strategy (FDS).

Some members do support in varying degrees the apparent intention to implement densification. Others are of the view that the approach taken (whereby brownfield development is favoured to the exclusion of greenfield development and decisions around Future Urban Zone land are reversed to the detriment of many who had previously invested in land and proposals to develop land in these zones) is a binary approach that lacks nuance, fails to account for the actual and convertible capacity in brownfield areas and makes assumptions about infrastructure capacity and costs of delivery that are incorrect.

In essence, our UDINZ view is that both greenfield and brownfield development are required for the reasons outlined below and that residents should be given greater choice around location and typology than is likely to result from the FDS.

We are also concerned about the way in which consultation on the FDS has occurred and what appears to be a failure to follow the methodology set out in the NPS UD.

Procedural concerns

The requirements

The FDS is a requirement of the Government's National Policy Statement on Urban Development (NPS-UD). https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-updated-may-2022/

An FDS is a high-level plan that sets out the general direction for growth that will help to promote the long term social, economic and environmental wellbeing of Auckland residents. The FDS identifies the choices and trade-offs that have to be made, as well as the benefits that will flow from well managed development.

The FDS must then be regularly reviewed and updated to inform future long-term plans.

An FDS needs to show:

- the broad locations for growth capacity (in existing and any new urban areas) over the long term (30 years);
- strategic infrastructure required to support and service that growth, including any corridors or sites required; and
- development constraints.

It must also include a clear statement of hapū and iwi values and aspirations for urban development.

The National Policy Statement on Urban Development (NPS-UD) says that, at a minimum, "well-functioning urban environments' are ones that:

- have or enable a variety of homes that meet people's needs in terms of type, price, and location;
- meet the needs of businesses (including by way of having a variety of sites suitable to different sectors);
- enable Māori to express their cultural traditions and norms;
- support market competition;
- have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change It requires that the FDS identifies, for housing and business and for both the medium and the long term:

Under the NPS-UD, Councils have to assess future demands for housing and businesses, identify the capacity of existing plans to accommodate the future growth and plan for the extra housing and necessary infrastructure.

It requires that the FDS identifies, for housing and business, and for both the medium and the long term:

- Demand;
- Existing feasible development capacity identified in housing and business development capacity assessments;
- Future feasible development capacity; and
- The broad location, timing and sequencing of future development capacity over the long term.

The HBA must quantify the development capacity that is sufficient to meet expected demand for housing and business land in the short, medium and long term.

There are a wide range of factors that are likely to influence future housing demand. Some commonly identified influences include:

- there will be more older adults, but under a high growth projection there could also be many more people of working age;
- housing needs to be more affordable for people on low to moderate incomes;
- climate change will see sea levels rise and more extreme weather patterns;
- how and where people work may change;

- types of infrastructure may change, for example rather than reliance on large networks, there may be more small scale, locally based systems
- roads will get busier and so alternatives like building up public transport and walking and cycling networks are needed; and
- different models of housing and living arrangements may become more desirable are resilient to the likely current and future effects of climate change.

The HBA that is required must quantify the development capacity that is sufficient to meet expected demand for housing and business land in the short, medium and long term. Sufficient development capacity' for residential land means plan-enabled, infrastructure ready, feasible and reasonably expected to be realised. Councils must allow for development capacity with a competitiveness margin (20% for the short and medium terms and 15% for the long term) over and above the expected demand for both housing and business.

Failure to properly assess development capacity

Here:

- No HBA has been completed for business land.
- The HBA for residential land is incomplete. A revised version meeting all the mandatory requirements will not be published until after the consultation period on the FDS is over.
- There is reference in the Draft FDS to a total plan-enabled capacity of 2,345,500 dwellings. This is based on the evaluation of development capacity done as part of the Section 32 evaluation for Plan Change 78 (PC78).
- Development provided by PC78 is not 'plan enabled' because this plan change is not operative and likely to change as a result of the natural hazard work being undertaken and then subject to decisions by independent commissioners who may make significant changes.
- The FDS does not provide for a competitiveness margin in its residential and business capacity figures.

We would be willing to help facilitate engagement from our membership and beyond were steps taken to rectify these shortcomings.

Failure to consult meaningfully

In order to prepare the draft FDS, local authorities must engage with the development sector to identify significant future development opportunities and infrastructure requirements. A representative of the UDINZ Auckland Chapter reached out to Auckland Council to seek to have a group of members meet with Council in late 2022 as the FDS was being developed, but no meeting ensued. It is understood that Auckland Council met only with the Property Council and Kainga Ora and that it surveyed developers with 30 responses received.

The period of consultation provided was grossly inadequate and the extension period through to 31 July 2023 (coinciding as it did with the July school holidays) meant many in the sector were not able to meaningfully engage with the process, despite the extension, due to family responsibilities.

In the round there has not been sufficient time for the sector to properly consider and comment on the proposed draft FDS.

Action required

Our opinion is that Council should withdraw the FDS and restart the process. A document of this complexity requires an extensive period of consultation with those impacted by it. A recent UDINZ event on the FDS was significantly oversubscribed. Despite the capacity of that event being twice extended some attendees still had to be waitlisted. This is an indication of the level of interest within our membership on this topic. We believe there are many who would be willing to engage constructively with the Council to inform a revised document were one to be provided.

We outline below some facets we believe are relevant to a discharge of Councils responsibilities under the NPS-UD in determining sufficient development capacity' for residential land that is plan-enabled, infrastructure ready, feasible and reasonably expected to be realised.

Substantive comments

Overestimation of latent potential

Those working to get housing developments across the line have reported that they consider modelling on the potential of existing residential (brownfield) zones often overestimates its latent potential, with the FDS being no exception. That's because of assumptions about capacity and conversion that are just not warranted.

As noted above in the FDS, assessment of plan-enabled capacity seems to have been based on the evaluation of development capacity done as part of the section 32 evaluation for PC78. PC 78 is not operative and the timeframe for its completion has been extended by a year. Height and density across the urban area is yet to be resolved. In particular, additional analysis is still to be undertaken on flood hazard extents, which may have a material impact on the capacity assumptions within the urban area.

Assumptions about extent existing infrastructure can accommodate intensification

The first assumption on capacity is we can simply intensify a standard ¼ acre block. However the rules around impervious areas and the constraints of the existing stormwater and waste water infrastructure mean, even using the parameters of PC 78 and the MDRS, a brown fields intensification is not as simple as it might seem.

It may be possible to accommodate and absorb needs of the first few developers, but after those first lucky few, intensification at the scale required rapidly outstrips the capacity of the existing infrastructure. Greening up, rain gardens and the like incorporated within well-sited developments and more thoughtful public realm development (trees and planting schemes) may help, but the existing water and wastewater constraints still operate as a brake on development (demand management the only lever there). Without extensive upgrading of public infrastructure in urban areas, the flooding we have seen in Auckland earlier in the year will continue.

It's also expensive and complex to install new pipes in such areas. The cost of putting in new pipes, some suggest more than four times the cost of putting new pipes in new developments, rests with the public sector and is not fully recouped via recovered development contributions in these areas (Watercare assesses Development Contributions as contributing only 11% of the cost of new development.) It's hard too for all utilities to assess when and where infill development will occur, putting them constantly in catch up mode.

Assumptions about scale of intensification possible in residential zones

The second capacity assumption is the scale of intensification that can be achieved. Developers in Auckland report that the way in which PC78 (Councils response to the National Policy statement on Urban development) is drafted means its actually more likely to yield 3 dwellings per site (and may be limited to certain typologies) than the projected latent capacity of 5 many had touted. This is because of the raft of rules and restrictions that need to be considered.

Brownfield sites often too small to achieve good urban and sustainability outcomes

Intensifying on small brownfield sites also has a tendency to attract small builders/developers with (generally speaking) smaller areas of influence, making it harder to achieve cohesive and well considered urban design outcomes overall at a system level. Land holdings are dispersed and it is hard to achieve the scale required to address all facets of properly designed densification.`

The use of brownfields as the predominant source of land supply, involving as it often does the demolition and disposal of existing dwellings and other built environment elements, can be more unsustainable and carbon intensive than one might initially consider.

Assumptions about conversion of latent capacity

Council's models also have not historically taken account of the fact that not all theoretically developable sites will be intensified. Some developers call this the conversion factor - whether the business case for development stacks up. That is currently more difficult than ever to achieve with neither the current cost of capital (for both developers and future homeowners) nor the prudential controls in play, assisting. And that's before we even factor in nimbyism.

Some residential land already used for social infrastructure

Not all areas zoned for residential can and will actually be used for residential. Some of these areas are already occupied by community and educational facilities. It's highly unlikely use for social infrastructure of this type would be eschewed in favour of redevelopment for housing. It appears in the FDS that some such land has been included when assessing land available for development.

Public transport not yet sufficient to justify transition

Transport further complicates the picture. All things being equal, better transport and housing intensification are mutually supportive. The trick is where to start. Some thought it would be the removal of private parking requirements. In theory this should operate to drive residents towards other transport options and also deliver more square metreage thereby optimising site utilisation. In reality however at this time the lack of viable public transport and active transport options and frequency considerations mean many remain heavily reliant on their cars. Anecdotally the removal of on-lot parking requirements seems only to have pushed private vehicles into the public realm, in turn making walking and cycling optionality more difficult to achieve, and clogging our already congested streets.

Incorrect cost assumptions made too about greenfields

Greenfield options are also not without their complications. Land prices are cheaper as you go out, but this is reflective of transport and infrastructure availability concerns and costs. Theoretically the infrastructure should be installed before or at the same time as development occurs. And then there's a question from some on who is paying for what. They ask is the spend required to service greenfield infrastructure overstated when one bears in mind the reality that the Council don't pay for infrastructure within a greenfield development, only for the "trunk" infrastructure that feeds it. Also the main arterial roads/motorways and rail upgrades are mostly funded by Central Government, aren't they?

Add to that the proposed changes to the development contribution rules, which are designed to disincentivise greenfield development because of the (flawed) assumption that housing needs can be met almost exclusively from an up, rather than out, policy.

This new policy is said to be designed to help ensure developers share (and pass onto homeowners) the cost of council investment in infrastructure. In more recent policy, that contribution is being revised by reference to a 30 year period of infrastructure need, rather than the previously, widely accepted, 10 year period (which corresponds with long term plans). There's no discounting for the time value of money or apparent consideration of cross generational subsidisation, so council keep increasing the cost of development, which will inevitably be paid for by the customer, a future ratepayer.

Those developing the trunk infrastructure, so say the development community, would be better to purchase or requisition the corridors required now (by using their Public Works Act and other powers). Failure to do so early means by the time they do purchase the necessary land the price of that land has increased significantly, increasing the overall cost of infrastructure delivery and reducing the ability to extract value from any pre-purchased corridor.

Apparent anti-growth agenda further exacerbates housing unaffordability

The NPS-UD is intended to deliver greater land supply and support housing affordability. Reduced areas for housing development (by the apparent exclusion of most greenfield development) reduce levels of competition. Scarcity in offering only operates to push house prices up.

"U-turn" on Auckland Unitary Plan positions undermines business confidence in region

The reversal of areas previously identified for development is unfair. It has the potential to reduce the willingness of private sector players to invest in land and development proposals in the region if they cannot have confidence that areas signalled as being available for development remain available. Significant time and energy was spend engaging with the Auckland Unitary Plan (AUP) and that appears now to have been cast aside.

How to best accommodate Auckland's urban growth was considered at length by the independent hearings panel on the AUP, chaired by the now Chief Environment Judge, which heard extensive economic and planning evidence regarding the potential risks and benefits of different growth strategies. Having heard that evidence, the Panel concluded that it was critical to the long-term well-being of people and communities in the region that errs toward over-enabling capacity.

The Panel said:
"...the implications for individuals and the community from an under-supply of enabled residential capacity (e.g. house price escalation, over-crowding, extended commuting distances, and migration out of the region) are much more severe than those of an oversupply of enabled capacity (e.g. the inefficient use for a period of land zoned for future urban use). Property markets are able to respond to the over-supply of enabled capacity by, for example, deferring the development of some land zoned for future urban, whereas markets are not able to remove the constraints and distortions from the under-supply of enabled capacity. Thus the Auckland region can be expected to perform more efficiently if the Unitary Plan errs toward an over-supply of enabled capacity than toward an under-supply. Given the level of uncertainty in the projections of demand and supply for the long term, it is neither practical nor prudent to try and target a precise level of enabled capacity."

The IHP concluded that it was important to provide multiple ways of accommodating growth, in both brownfield and greenfield areas, to ensure that sufficient development capacity is delivered

Wasted investment in Infrastructure developed for FUZ

Significant funds have been invested in infrastructure upgrades to serve FUZ land. These assets will not be fully utilised if the greenfield land which they were initially intended to service can no longer be developed to the extent initially anticipated.

"Stop/start" nature of FDS belies the way market operates

A continuous flow of work is required for good operation and health of the sector. Development capacity is not like a tap that can be turned off and turned on again at will.

Delayed developments risk loss of construction and supply chain

The product and services providers who work in development do not always have alternative work to tide them over to some future point in time when development opportunities restart. There is a very real risk of further reduced capacity and, given existing distress in the market, also some risk of the dissolution of organisations faced by solvency considerations. This is exacerbated where providers have secured borrowings with security over personal assets. Trading while insolvent considerations will be front of mind for many in this current environment.

.

Greenfield makes valuable contributions

It is critical that the option of well planned greenfield development remains alongside brownfield so there is sufficient residential capacity to meet demand and to support the competition that results in better housing affordability. It also preserves choice for residents.

Greenfield development also offers the opportunity to support infrastructure development. Greenfield developments are typically comprehensively master planned and tends to result in a much higher quality neighbourhood (in terms of subdivision and roading layout, stormwater management, community facilities, etc.) than can be achieved when attempting to retrofit modern development principles into an existing urban area.

Blanket expansion of the rural urban boundary can lead to poor outcomes, but with the right planning, managed expansion can deliver high quality integrated outcomes (infrastructure and housing) at more affordable price points.

Greenfield certainly has an ongoing role to play alongside brownfield.

Conclusion

As noted above, our view is that Council should withdraw the FDS and restart the process.

As part of that process:

- An HBA for business land is required.
- An HBA for residential land meeting all the mandatory requirements must be operative before a revised FDS is shared.
- The plan-enabled capacity cannot be properly determined until natural hazard work currently being undertaken is complete.
- The revised FDS must provide for a competitiveness margin in its residential and business capacity figures.

A meaningful consultation period is also required.

We are happy to assist Council in facilitating access to our membership to inform any future process or in working to improve the existing draft FDS.

#8299

UDINZ

creating urban communities together



Contact Information:

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www.udinz.nz

Future Development Plan 2023 #8301

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work.
Given the existing infrastructure and community facilities, it is an efficient and compact outcome to retain the Warkworth South-East land as Future Urban. This will provide the required degree of certainty and facilitate opportunities for land development to deliver land for employment and housing as required to respond to growth demands in Warkworth.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

As set out above the land is in close proximity to infrastructure, a local centre, the Town Centre, schools and other education facilities and employment options. In any event, proximity to workplaces, services, facilities and shops are maters that are typically addressed in detail in plan changes and alone are not reason to remove Future Urban zoning from the land. There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Tell us why

Warkworth South-East is not constrained by environmental hazards – there is no significant natural hazard risk. Greenfields development often responds better, and the response is more efficient, in terms of managing potential hazards such as flooding. In any event, as addressed above, the existing policy and legal framework requires hazard risk to be fully assessed through any proposed plan change process.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Tell us why

Such outcomes will be achieved via land rezoning in the current policy and legal context. The draft FDS removes the certainty that the Future Urban zone was supposed to provide to landowners and the agencies responsible for delivering infrastructure. The draft FDS creates uncertainty that will mean there is less likelihood of quality urban outcomes being achieved.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

The Future Urban zoned land at Warkworth South-East is well placed to deliver a range of housing options in the future. It is close to infrastructure, a local centre, employment options and education facilities.

WNF seeks that the Future Urban zoning be retained at Warkworth South-East.

WNF wishes to be heard in support of its submission and requests hearings be held to facilitate this outcome.

27 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

Submitter Details

This feedback is provided on behalf of:	Warkworth Natural Farm Limited ("**WNF**")
Property or Interest Affected by the FDS:	All the Future Urban zone labelled Warkworth South-East, and specifically the land owned by Warkworth Natural Farm Limited.

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Submission Details

The submitter has a particular interest in the land at McKinney Road Warkworth identified on the snip on the following page:

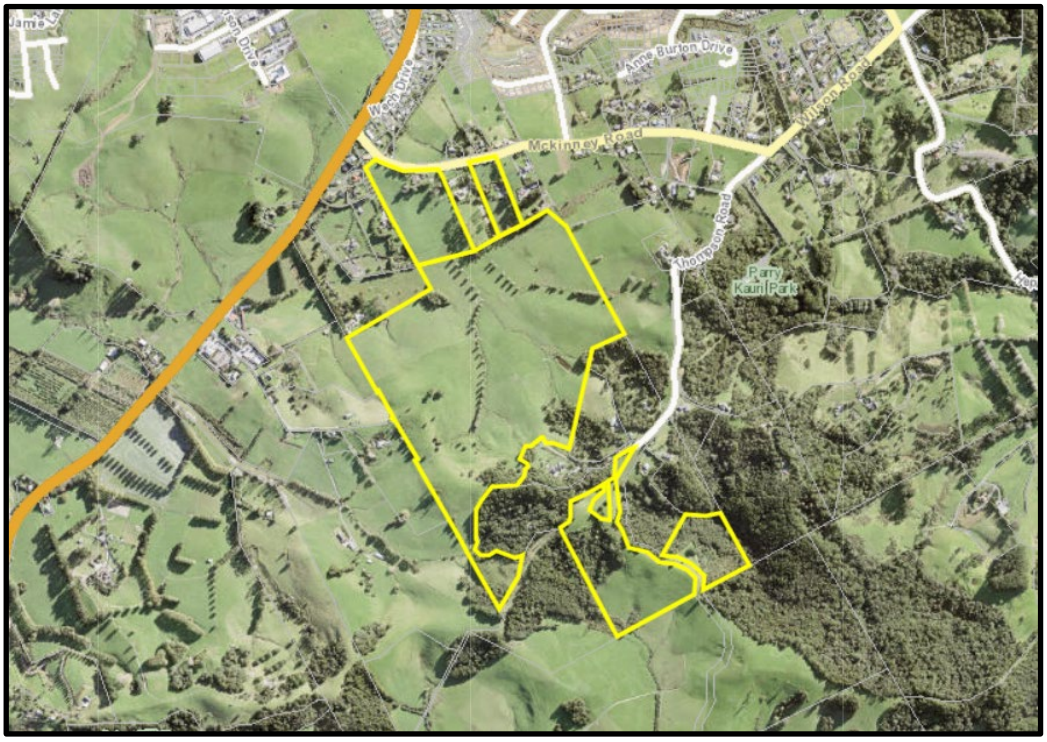


Figure 1 – Land Owned by Warkworth Natural Farm Limited

Most of the land owned by WNF is within the Future Urban Zone. The land has legal frontage to McKinney Road, Warkworth. All of the land to the north of McKinney Road that was zoned Future Urban is now either rezoned to an urban zone or is subject to resource consent for urban development and construction has commenced, meaning the granted resource consents are being implemented.

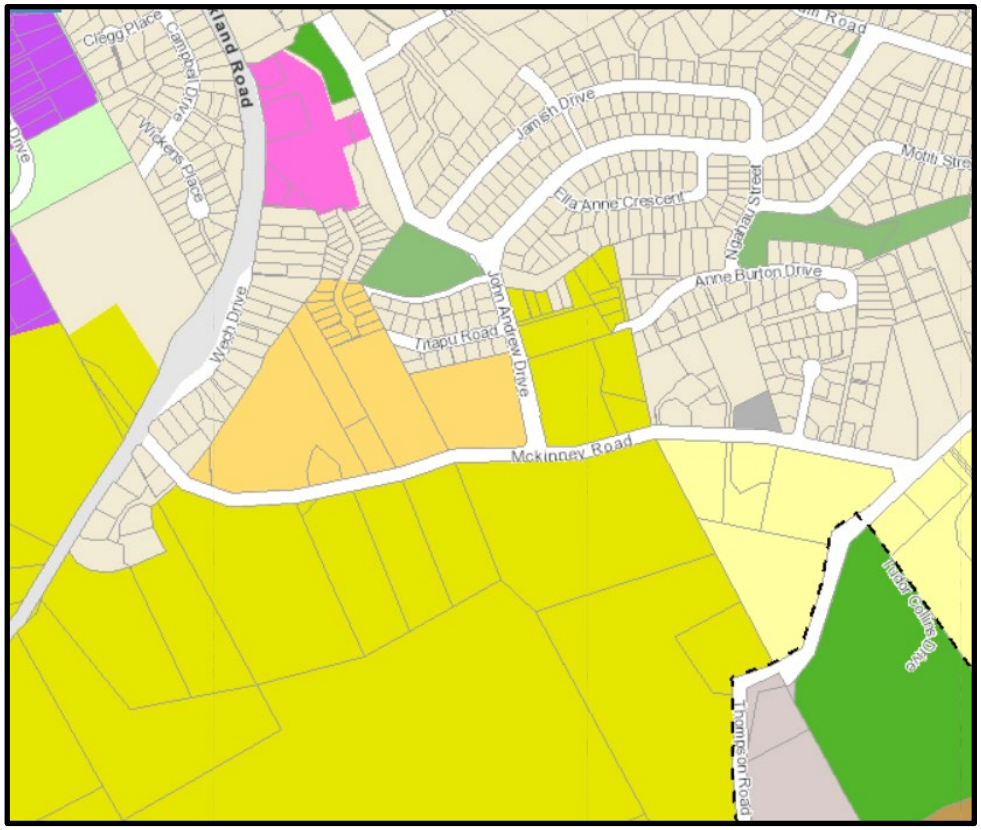


Figure 2 – Unitary Plan Map – Zoning of Land North of McKinney Road, Warkworth

Generic Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

(a) the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15
(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement
(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

Site Specific Feedback

The draft FDS shows the Warkworth South-East area as area *Recommended for Further Investigation* the following reasons:

1. Infrastructure – specifically no rapid transit network planned, and so the area would not contribute to VKT reduction. This is related to the distance from the existing urban area.
2. Urban Form – This relates to the provision of business land and further understanding being required of the role of Warkworth as a Rural Node.
3. Emissions / VKT reduction.

This submission demonstrates that these reasons are flawed and unsubstantiated for the following reasons:

- Infrastructure: The land directly adjoins the existing urban area and fronts McKinney Road. In real terms the land is in relatively close proximity to the town centre and in close proximity to the Grange, an established retail area. There are reticulated services in place to the north and south of McKinney Road as shown below:

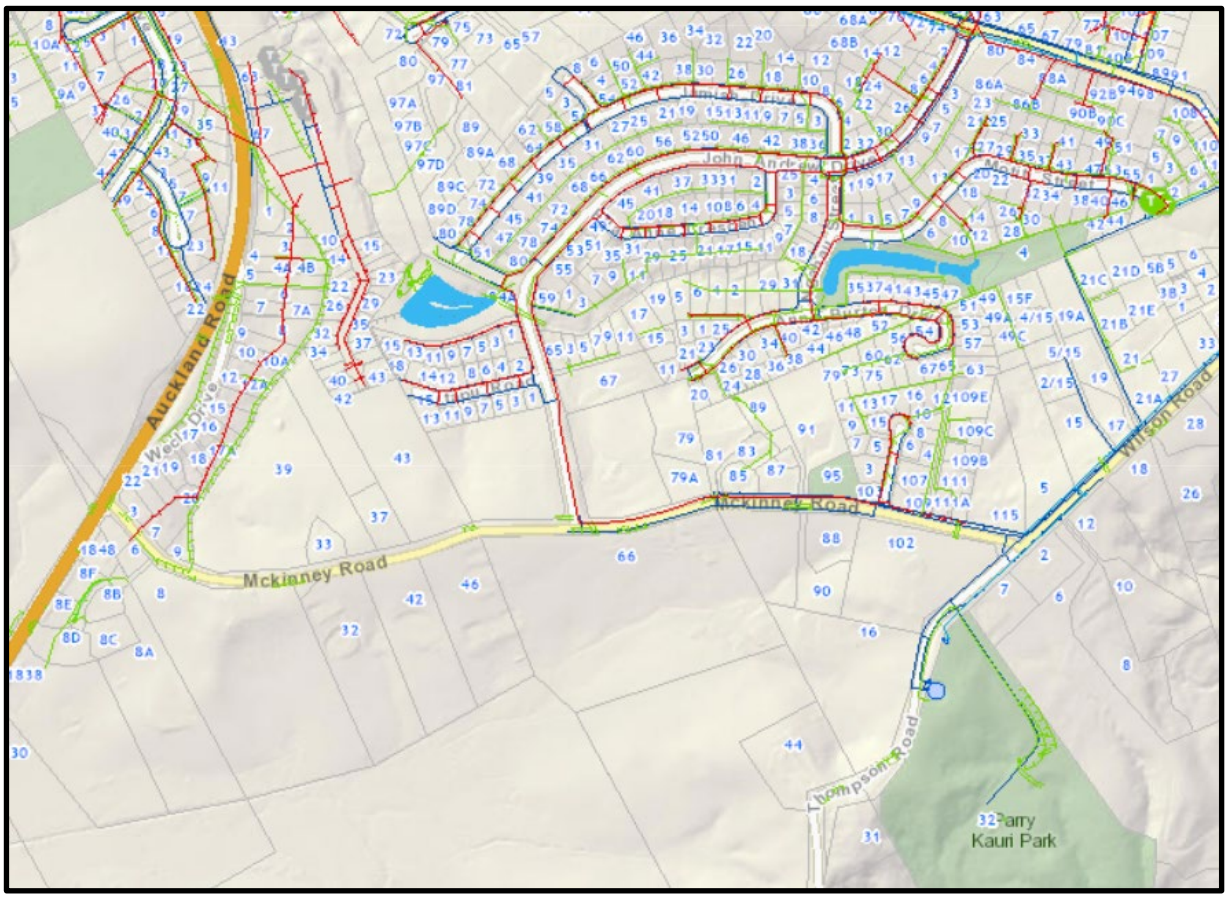


Figure 3 – Auckland Council Geomaps – Reticulated Services – Council Assets

- Urban Form: The land can directly access McKinney Road. There is development occurring along McKinney Road that has resulted in road upgrades including footpaths and the soon to be

completed John Andrew Drive connection. There is good connectivity provided through the established residential area in McKinney Valley.

- Emissions / VKT reduction: For the reasons stated above this area is suitable for development. It is in close to employment nodes in the industrial area on Woodcocks Road and the Grange. There is also reasonably direct access to the town centre through the McKinney Valley.

  The land is close to education establishments including early childhood learning centres, Mahurangi College and the tertiary opportunities provided through Manukau Institute of Technology campus facilities in Woodcocks Road.

  The land is well placed to provide opportunities to reduce vehicle kilometres travelled.

Specific Feedback in Response to Have Your Say

Focusing Growth:
Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

What do you think of our approach to focus most of Auckland's growth in existing urban areas?

The above assumptions are not based on factual evidence. Evidence indicates that greenfield land is less costly to develop and can be more efficient in terms of responding to the effects of climate change; providing for a well-functioning urban environment; delivering the required infrastructure and providing choices for where and how people live and work.

Given the existing infrastructure and community facilities, it is an efficient and compact outcome to retain the Warkworth South-East land as Future Urban. This will provide the required degree of certainty and facilitate opportunities for land development to deliver land for employment and housing as required to respond to growth demands in Warkworth.

Accessible Local Centres:
When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

What do you think of our approach to focus development near local centres?

As set out above the land is in close proximity to infrastructure, a local centre, the Town Centre, schools and other education facilities and employment options. In any event, proximity to workplaces, services, facilities and shops are matters that are typically addressed in detail in plan changes and alone are not reason to remove Future Urban zoning from the land. There is already a clear policy framework in the Unitary Plan and the NPS UD that requires these aspects to be thoroughly considered in any proposed re-zoning.

Avoiding Hazards:
As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Warkworth South-East is not constrained by environmental hazards – there is no significant natural hazard risk. Greenfields development often responds better, and the response is more efficient, in terms of managing potential hazards such as flooding. In any event, as addressed above, the existing policy and legal framework requires hazard risk to be fully assessed through any proposed plan change process.

Resilient Infrastructure:
Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Such outcomes will be achieved via land rezoning in the current policy and legal context. The draft FDS removes the certainty that the Future Urban zone was supposed to provide to landowners and the agencies responsible for delivering infrastructure. The draft FDS creates uncertainty that will mean there is less likelihood of quality urban outcomes being achieved.

Conclusions and Outcomes Sought

There is no factual or evidential basis to support the approach set out in the draft FDS. The draft FDS will create uncertainty and reduce opportunities to create well-functioning urban environments that will have longevity in terms of quality now and into the future.

The Future Urban zoned land at Warkworth South-East is well placed to deliver a range of housing options in the future. It is close to infrastructure, a local centre, employment options and education facilities.

WNF seeks that the Future Urban zoning be retained at Warkworth South-East.

WNF wishes to be heard in support of its submission and requests hearings be held to facilitate this outcome.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
[redacted]
Email: burnette@thepc.co.nz

Future Development Plan 2023 #8302

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

The FDS promotes infill housing as a solution to our current housing shortage. However, there is a high level of uncertainty regarding Plan Change 78 and related plan changes, and there are significant infrastructure issues, namely internal financial constraints within Council, that need to be resolved to provide for further growth in existing urban areas. These shortfalls related to intensifying existing urban areas must be compared to the cost and efficiencies of developing greenfield land, as in many cases, developing greenfield sites result in beter outcomes for urban form, connectivity, safety, lifestyle options, climate change resilience and natural hazard mitigation.
In any event the subject land is in close proximity to the Town Centre and has resource consent for urban development. This needs to be recognized in the FDS.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why
Development can simultaneously occur in existing urban areas near local centres and occur on greenfield sites providing for high quality living opportunities on the urban fringe. A balance is required. Re-development of existing urban areas is often less efficient than greenfields development.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Tell us why
Natural hazards should be avoided, or appropriately mitigated. There are often opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process for urban development on greenfields land.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why
This is a sound premise for obtaining quality urban outcomes and well-functioning urban environments. This is already required by the existing planning framework.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

The Kilns Limited seeks that the FDS is amended to identify the land at 34 and 36 Sandspit Road, Warkworth as “Resource Consent Area.” It is sought that the relevant maps are updated, including any mention of this particular land area within the draft document.

The Kilns Limited wishes to be heard in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

27 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback details the submitter, the affected properties and responds to the provisions of the FDS in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of: The Kilns Limited (the submitter)

Property or Interest Affected by the FDS: [redacted]

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Property Details

The submitter has a particular interest in the land at [redacted]. Combined, these lots equate to approximately 2.9ha in area.

The sites are zoned Future Urban and are subject to the following overlays:

- Natural Resources: Significant Ecological Areas Overlay - SEA_T_6684, Terrestrial
- Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Mahurangi Waitemata

- Natural Heritage: Outstanding Natural Landscapes Overlay [rcp/dp] - Area 43, West Mahurangi Harbour
- Historic Heritage and Special Character: Historic Heritage Overlay Extent of Place [rcp/dp] - 569, Combes/Daldy lime works site R09_2240, 0, 0

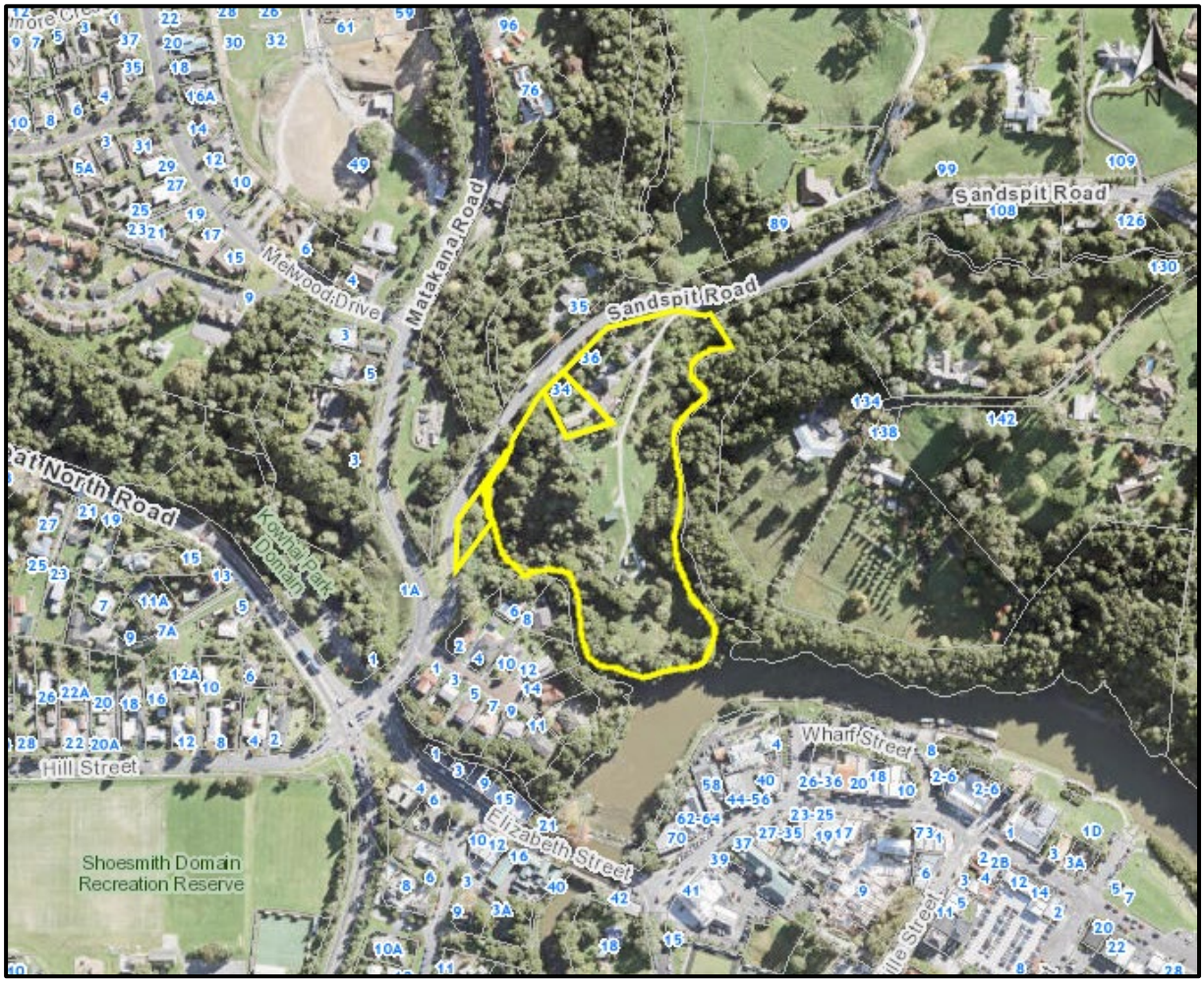


Figure 1: Aerial image of subject site (Source: Auckland Council GeoMaps)

On 26 May 2023, the submitter obtained resource consent to develop the land and construct 49 new dwellings with associated earthworks, impervious surfaces, and servicing. The resource consent application number is BUN60400973 (LUC60400974, DIS60400975, SUB60400976 and WAT60402764).

The site is located within easy walking distance of Warkworth Town Centre and adjoins the Mahurangi River at the site's most southern point and Viponds Creek to the west. The consented development provides for a range of housing options (13 3-storey terraced dwellings, 10 2-storey duplexes, 4 2-storey standalone dwellings, 15 2-storey terraced dwellings, 6 1-storey duplexes an a single 1-storey standalone dwelling). The development vests Esplanade Reverse and Local Purpose Reserve, and provides public access via a gravel pathway to the Lime Works Kiln (historic heritage site) adjacent to the river. A second connection is to be provided via a shared pathway and bridge from the southern side of Sandspit Road through to an existing pathway on Millstream Place. The consented development not only provides greater access to green spaces and heritage spaces in Warkworth, but facilitates pedestrian/cycle connection between the rural and urban areas currently dominated by vehicular transport connection.

In terms of Plan Change 78: Intensification, a submission was made requesting that the site be rezoned from Future Urban to Residential – Mixed Housing Urban. The subject site is currently excluded from PC78 and was sought to be included via the submission. The Hearings Panel has advised that such submissions are 'within scope' of the Plan Change.

A private plan change request has also been lodged but is currently on hold pending the outcome of Plan Change 78.



Figure 2: Artist impression of completed development BUN60400973 (Source: PENZL)

Generic Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

> *(1) The purpose of the FDS is:*
>
> *(a) to promote long-term strategic planning by setting out how a local authority intends to:*
>
> *(i) achieve well-functioning urban environments in its existing and future urban areas; and*
>
> *(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

(a) the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15

(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Given that resource consent has been granted for development of the site and has a 10-year lapse date, the land should be identified in the FDS as "Resource Consent Area" in the same way the consented development at Upper Ōrewa is identified.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The FDS proposes to include the land in the area identified as Warkworth North. The land was in the area identified as Warkworth North-East in the Future Urban Land Supply Strategy 2017 ("FULSS"). Warkworth North-East was scheduled to be *development ready* in the second half of the second decade – 2033 – 2037. The draft FDS proposes the remaining un-zoned areas of Warkworth North will be *development ready* in 2035+. Given the proximity to the Warkworth Town Centre and the granted resource consent with a lapse period of 10-years, the subject land should be identified as Resource Consent Area.



Figure 3: Subject site classified as Warkworth North East in FULSS (shown by red marker)
(Source: Auckland Future Urban Land Supply Strategy, pg.6)

Site Specific Feedback

The FDS proposes the land be incorporated into the Warkworth North area. This is supported.

The FDS states, *the future development strategy reassessed all future urban areas (FUAs) that had not been live zoned (as at 2023).* As of 26 May 2023, the land at [redacted] can be developed in accordance with BUN60400973. The submitter has resource consent to develop the land ahead of the projected live-zoning of the area. It is requested that the landbe identified as Resource Consent Area, consistent with Upper Ōrewa.

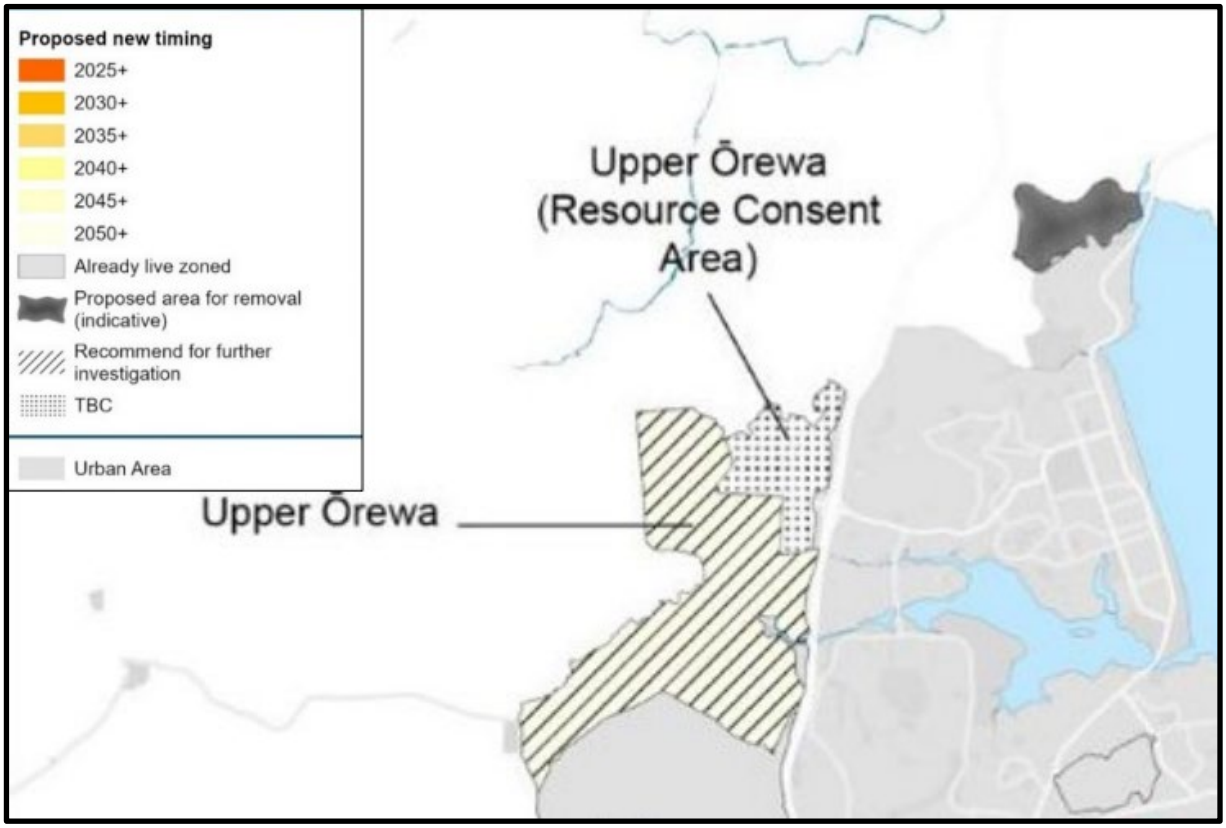


Figure 4: Example of "Resource Consent Area" applied to Upper Ōrewa
(Source: Draft FDS, Appendix 8, Appendix Pg. 43)

Specific Feedback in Response to Have Your Say

Focusing Growth:
Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

What do you think of our approach to focus most of Auckland's growth in existing urban areas?

The FDS promotes infill housing as a solution to our current housing shortage. However, there is a high level of uncertainty regarding Plan Change 78 and related plan changes, and there are significant infrastructure issues, namely internal financial constraints within Council, that need to be resolved to provide for further growth in existing urban areas. These shortfalls related to intensifying existing urban areas must be compared to the cost and efficiencies of developing greenfield land, as in many cases, developing greenfield sites result in better outcomes for urban form, connectivity, safety, lifestyle options, climate change resilience and natural hazard mitigation.

In any event the subject land is in close proximity to the Town Centre and has resource consent for urban development. This needs to be recognized in the FDS.

Accessible Local Centres:
When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.
We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

What do you think of our approach to focus development near local centres?

Development can simultaneously occur in existing urban areas near local centres and occur on greenfield sites providing for high quality living opportunities on the urban fringe. A balance is required. Re-development of existing urban areas is often less efficient than greenfields development.

Avoiding Hazards:
As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Natural hazards should be avoided, or appropriately mitigated. There are often opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process for urban development on greenfields land.

Resilient Infrastructure:
Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology
.
Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

This is a sound premise for obtaining quality urban outcomes and well-functioning urban environments. This is already required by the existing planning framework.

Conclusions and Outcomes Sought

The Kilns Limited seeks that the FDS is amended to identify the land at [redacted] as "Resource Consent Area." It is sought that the relevant maps are updated, including any mention of this particular land area within the draft document.

The Kilns Limited wishes to be heard in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
[redacted]
Email: burnette@thepc.co.nz

End of Letter

Future Development Plan 2023 #8303

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. **What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?**

Tell us why

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. **What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?**

Tell us why

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Please refer to the attachment

26 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback details the submitter and responds to the provisions of the FDS in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on via the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of Fortland Capital

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Generic Feedback

The National Policy Statement – Urban Development 2020 (updated May 2022) ("NPS-UD") requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *"…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority".*

The FDS has to apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:

(a) to promote long-term strategic planning by setting out how a local authority intends to:

(i) achieve well-functioning urban environments in its existing and future urban areas; and

(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and

(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.

(2) Every FDS must spatially identify:

(a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and

(b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and

(c) any constraints on development.

(3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

Clause 3.14 states the FDS must be informed by:

(a) the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),

(b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS

(c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans

(d) Māori, and in particular tangata whenua, values and aspirations for urban development

(e) feedback received through the consultation and engagement required by clause 3.15

(f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement

(g) any other relevant national policy required by, or issued under, legislation.

Clause 3.17 of the NPS-UD states that every local authority must have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the NPS-UD require that when preparing and reviewing an FDS, local authorities must engage with the development sector to identify significant future development opportunities and infrastructure requirements. Clause 3.16 (2) of the NPS-UD further requires that local authorities must engage with landowners, when reviewing an FDS.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The FDS provides Auckland Council an opportunity to reinforce and refine the existing growth strategy set out in the Unitary Plan, in order to address the existing process delays and underinvestment in growth-supporting infrastructure. Instead, Council is using their current 'financially constrained environment' and 'uncertain future' as reasoning to create further market uncertainty and consequently slow the uptake of development capacity. This is the direct opposite outcome from what is required.

The FDS is also an opportunity to provide a clear strategy for the short-medium term growth (or at least for a 6-year outlook to align with each FDS review) requirements of Auckland and provide a pathway for a more ambitious and opportunistic strategy for the long-term growth. Instead, Council has chosen to set a vague *vision* for the built environment of Tāmaki Makaurau, Auckland, which is [emphasis added]:

> *Auckland's built environment will underpin the development* ***of prosperous, inclusive, and vibrant communities****. Quality development will help to regenerate the environment and deliver our commitments to* ***greenhouse gas emission reduction*** *as we grow and change.*

It is apparent that Council has initiated a crack-down on greenfield developments and a freeze-control to the existing urban form and growth pattern. This has been misinformed by its own manufactured financial constraints, outdated HBA and preference for ad-hoc infill developments which in turn only delivers myopic, piecemeal infrastructure solutions or 'bandages'. This leaves our infrastructure (and its ability to support urban development) in a constant state of deficit/catch-up, rather than being efficiently and effectively "future-proofed" to accommodate long-term growth.

In reality, the uptake of development capacity will mostly be realised by the private sector and not Auckland Council. This has been clearly demonstrated over the last 7-years since the Unitary Plan became operative. Auckland Council has notified one plan change (Whenuapai), which was so defective that it eventually had to be withdrawn. This means the growth demand, will in reality, be met by the actions of developers who will deliver and/or support the majority of prosperous, inclusive, and vibrant communities, and put in the legal mechanisms and physical infrastructure to realise greenhouse gas emission reductions. Developers pay the upfront costs for service networks and now more commonly transmission networks (as a minimum) and pay for development contributions (DC) and infrastructure growth charges (IGC).

It is generally understood that Auckland Council's projects will be funded by ratepayers, DCs and IGC's and in some cases with government funding where there are national or cross-regional benefits. Even given these available financial tools, Council has not taken advantage of the opportunity to be more strategic and ambitious with its long-term infrastructure strategy. Council even considers that the creation of Water Services Entities as part of the Affordable Water Reform 'will create new challenges', as opposed to viewing this as an opportunity to properly plan and provide adequate three-waters infrastructure to accommodate longer-term growth, freed from the current funding constraints. Fortland agrees with the Council's approach of wanting to get "best value for money" from infrastructure investment. However, there should also be a focus on increasing the pool of finances available for infrastructure and gaining access to such finances through all mechanisms that are made available to the Council for that purpose.

Fortland requests that the FDS recognises and reinforces the significant role of future urban areas (for Auckland, the "Future Urban Zone" (FUZ)) make in terms of their ability to deliver affordable urban development and create a variety of housing and living environments as well as integrated employment areas. But at the same time, the FDS needs to recognise it is not realistic for the growth demand to be met and infrastructure issues to be resolved if greenfield development is constrained, at least to the extent proposed in the FDS. The FDS needs to provide a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks. These opportunities are discussed in light of the following issues below, with Fortland's responses being informed by the various professional assessments (economic, planning and legal) it has had undertaken regarding the FDS.

In addition, Fortland requests that the Council hold a specific hearing process for the FDS submissions (not just invite submitters to speak at an upcoming Council meeting), given the importance of the FDS/submissions. Fortland wishes to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Specific issues that are contrary to Clause 3.13 of the NPS-UD:

1. The FDS in its current form cannot *promote long-term strategic planning (clause 3.13(a))* because:

   a) The FDS has misconstrued growth in some FUZ areas as 'expansive' urban form and not 'compact', despite this zoning being established through the Unitary Plan process, which has a policy framework that requires a quality compact urban form to be realised. In doing this, Council has not acknowledged (and undermined) the significant role well-planned future urban areas in greenfields and around existing rural settlements can provide to improve functionality and connectivity within and between existing urban environments, and the self-sufficiency of existing remote settlements. The FDS provides a unique opportunity to consider where urban development should most appropriately occur on a region-wide basis, unconstrained by the approach that was taken/future development areas that were identified by legacy Councils, who did not have the luxury of taking a "region-wide" view as we do now. Fortland strongly considers that in order to properly achieve the requirements of the NPS-UD, that opportunity must be properly utilised.

   b) The FDS proceeds on the assumption that the only way of reducing car dependency and vehicle kilometres travelled is to promote intensification and preclude urban expansion. That assumption is incorrect. There is clear evidence that quality greenfield development can be undertaken in a way that minimises residents' needs for private vehicle use. Creating thriving town centres in these areas, with good active mode/public transport networks and high value employment opportunities, means these developments can also support (and therefore reduce the private car dependency of) neighbouring areas that currently do not have such services.

   c) The FDS understates the need to decouple some of Auckland's most vulnerable infrastructure networks to alternative locations and routes to genuinely build resilience into the region's infrastructure network for the long-term. Instead, the Council focuses growth on existing exhausted infrastructure i.e., 'non-built solutions', and prioritises infrastructure projects that achieve a 'least monetary cost' or 'best value for money' outcome, low or zero emissions, circular resource use, with little regard to the consequences and inequities this may have on future generations.

   d) Council references and appears to draw its position on infrastructure investment and costs from the findings of a 2009, Australian based research paper [1], which is outdated and should not be referred to in isolation without comparison with recent research, especially in the Auckland/ New Zealand context. New Zealand's per-capita investment in other ("non-dwelling") buildings and structures over the last 40 years has consistently been below that of Australia and other countries such as Canada, and the US, and generally lower than the UK as well.[2] No other cost and benefit analysis has been undertaken and/or made publicly available to support the FDS's claim that 'additional growth at the fringes of our [Auckland Council's] existing networks is the least cost-effective investment in infrastructure to support growth.' In fact, there is evidence to

[1] Page 19 of FDS, footnote (3) which references: *Trubka R, Newman P, Bilsborough, D, 2009. Assessing the costs of alternative development paths in Australian cities, Curtin University of Technology*.

[2] https://www.infometrics.co.nz/article/2020-06-new-zealand-infrastructure-spending-lags-international-partners. The official definition of the "other buildings and structures" category includes most non-residential buildings, roading, water assets, communications and power assets, and mining elements.

suggest that greenfield development is circa 30% cheaper for housing than infill[3].

2. The FDS in its current form cannot achieve *well-functioning urban environments (clause 3.13(a)(i))* because:

   a) The FDS does not provide for the supply of 'affordable housing', especially when assessing plan-enabled capacity and development capacity. The FDS draws data from an unofficial, unreleased draft Housing and Business Development Capacity Assessment (draft HBA). Because the Draft HBA is unavailable for consideration at the time of submissions, it is unclear why the supply of affordable housing was unaccounted for in the FDS. Regardless, the following findings of the last official HBA of 2021 sets a critical benchmark:

      i. The HBA 2021 does not assess affordable housing based on the region as a whole, rather it is assessed only against a group of lower income households, referred to as 'intermediate households.'[4]

      ii. The HBA 2021 estimates that only 1,740 or 1.8% of the total 97,200 intermediate households are expected to afford a home annually, under the Unitary Plan.

      iii. The HBA 2021 states that 'if the supply of affordable housing (housing priced at $770,000 or less) grows at a rate lower than 4.5 per cent, the mathematical model fails to find a finite solution, that is, the housing unaffordability situation of Auckland becomes permanent'.[5]

      Point (iii) above is a critical measure, which has been dismissed entirely in this FDS. Based on the findings above, there is already insufficient affordable housing, and more concerningly, that housing unaffordability is expected to be a permanent issue facing Auckland.

   b) The FDS draws data from the draft HBA to assess 'commercially feasible' capacity, which is currently unreleased and therefore unavailable for consideration in this submission. Assuming the draft HBA uses the same assessment methodology as the last official HBA 2021, 'commercially feasible' capacity would include both residential and future urban zones.[6] Hence, the following findings of the last official HBA of 2021 sets a critical benchmark:

      i. Under the maximum percentage of profit yield scenario, approximately 840,000 residential dwellings were considered commercially feasible with the average sales price of $1.66 million and terrace housing making up most of the feasible typology.

      ii. Under the minimum priced dwelling scenario, about 1.4 million residential dwellings were considered commercially feasible where the average sales price is $1.04 million, and apartments and terraces make over 84 per cent of the feasible dwellings tested.

      The average sale price in both scenarios would mean that 'commercially feasible' capacity was already unmatched with sufficient affordable housing (housing priced at $770,000 or less at the

[3] Based on analysis of new infill and greenfield dwelling build data in Auckland sourced from CoreLogic.
[4] The intermediate households consist of private renter households and the level of income required to affordably pay the mortgage on a dwelling purchased at the lower quartile dwelling sale price. Required income is $132,300 for a sales price of ($770,000) (Mitchell 2019, 2020) on Page 8 of the HBA 2021.
[5] page 81 of the HBA 2021.
[6] Page 51 of the HBA 2021.

time of HBA 2021). This means the potential uptake of affordable housing development capacity may already be insufficient to meet demand. The removal of future urban zoned land would likely worsen this if taken out of the equation.

c) The FDS has disproportionally focussed future development capacity and infrastructure commitments to existing employment, services, and rapid transit networks. This is at the expense of existing residential, car-dominant suburbs that need more local employment options, services, facilities, and alternative modes of transport that are safe, reliable, and efficient. To meaningfully reduce travel time, emissions and lower household transport costs without reducing the quality of life, the FDS needs to have a region-wide 'easy access-for-all' approach before focussing on 'priority areas'. As noted, this can (usually most effectively) be achieved via greenfield development.

d) In developing the FDS's spatial response, Council has relied on assumptions to evaluate alternative growth pattern scenarios in Part 3. Some of the assumptions/key themes arising from that evaluation have resulted in missed opportunities for appropriate and efficient growth outcomes, such as:

Point 2: *'Reducing vehicle emissions needs to focus on current travel patterns and behaviours, rather than rely on changing growth and development, although the latter can play a significant part in setting Tāmaki Makaurau up for reduced emissions over the longer term.'; and*

Point 6: *"Compact urban forms perform better in terms of least monetary cost of infrastructure over time, as they result in more efficient use of existing services and new infrastructure. More expansive urban forms require the greatest amount of new infrastructure with the most significant costs."*

The government's Hamilton-Auckland Corridor Partnership, Plan and Programme[7] earmarks South Auckland, in particular the area from Papakura to Pokeno to be one of Auckland's and New Zealand's fastest growing areas. All four growth scenarios in the FDS adopts the current singular, linear movement pattern heavily dictated by State Highway 1 in the South. Compact form should be coupled with resilient infrastructure networks; however, the adoption of a 'least monetary cost' approach to aging and already-underinvested infrastructure networks will only prevent investigation and strategic investment in projects that have long-term, inter-generational benefits. An example of this is an alternative SH1 Rapid Transit Network (RTN) corridor from the Auckland Airport (possibly extending Light Rail or the Botany-Airport RTN) to Pukekohe/ Paerata, which can also carry the Waikato 2 Watermain planned connect through to and across the Pahurehure Inlet.

3. The FDS in its current form cannot provide certainty that there is *at least sufficient development capacity for housing and business land, as required by clauses 3.2 and 3.3 (clause 3.13(a)(ii))* because:

a) Council's updated (current) HBA is still in draft.

[7] https://www.hud.govt.nz/assets/Uploads/Documents/Cabinet-paper-Hamilton-Auckland-Corridor-Partnership-Plan-and-Programme.pdf and https://futureproof.org.nz/assets/FutureProof/H2A/Final-H2A-Plan-November-2020.pdf.

b) Plan-enabled dwelling and business land capacity needs to be commercially feasible and infrastructure-ready to be realised. In many cases, small-scale infill developments will become commercially infeasible if the developer must bear the upfront costs of bulk infrastructure upgrades on top of increasing land values and construction costs. Simply such projects will not be of sufficient scale to warrant the costs of the infrastructure upgrades required. Alternatively, large greenfield and regeneration brownfield developments in the right locations can build housing and non-residential building at scale and incorporate forward-thinking urban planning to ease the pressure on strained infrastructure systems and social facilities.

c) Council acknowledges that 'take-up will vary' making it difficult to plan for cost-recovery, ring-fence DC's and budget for future projects. The development capacity should be assessed and presented by location and market (type, size, and price) to address existing sub-regional inequities in the accessibility to and distribution of jobs, alternative modes of transport and community facilities.

d) The "command and control" philosophy that the Council has adopted to date, through the existing Future Land Supply Strategy 2017 (FULSS) has not provided a robust strategy to deliver housing (and associated infrastructure) at the right pace and in the right places. The Council "blames" (and is upset with) the development community/private sector for not following the FULSS, but instead brining private plan changes ahead of the timing indicated in the FULSS. The Council says this "*has removed any degree of certainty in sequencing and timing of growth and has forced the Council group to become more reactive to ever changing priorities – both in timing of development and the number and spread of areas being live zoned*".[8] However, the reality is that the FULSS was set by the Council, without sufficient consultation or understanding of the current market demands around housing. The same mistakes cannot be made with the FDS – so the Council must understand that the market will not simply abide by and adopt the Council's (generally unpragmatic) preferences around urban growth. Rather, the Council and private sector need to work closely and collaboratively, to establish an FDS/strategic plan that actually works for the community it is supposed to serve, by reflecting the community/market's preferences (not just those of the Council).

[8] Page 39 of FDS.

Conclusions and Outcomes Sought

In summary, Fortland requests the following:

- The FDS reinforce and support the significant role of future urban areas, and that Council provides a pathway for growth outside the current urban form, where it can deliver better-functioning communities (rural and urban), ecosystems and more resilient interconnecting infrastructure networks.

- Development capacity be assessed and presented by location and market (type, size, and price) to address existing sub-regional inequities in the accessibility to, and distribution of jobs, alternative modes of transport and community facilities, including parks, reserves and other open space networks.

- To meaningfully reduce travel time, emissions and lower household transport costs without reducing the quality of life, the FDS adopt a region-wide 'easy access-for-all' approach before focusing on 'priority areas.'

- The FDS not be based on a 'least monetary cost' approach and instead, provide a pathway for a more ambitious and opportunistic long-term growth strategy with inter-generational benefits that will provide lasting quality urban environments for generations to come.

- The FDS must consider the supply of 'affordable housing' when assessing plan-enabled capacity and development capacity and include mechanisms to ensure the supply of affordable housing does not grow at a rate lower than 4.5 per cent.

- Auckland Council hold a specific hearing process for the FDS submissions (not just invite submitters to speak at an upcoming Council meeting), given the importance of the FDS/submissions. To reiterate, Fortland wishes to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
Email: burnette@thepc.co.nz
[redacted]

End of Letter

Future Development Plan 2023 #8304

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Tell us why

Infill is not likely to achieve the amount of housing the Council has assessed. There is a high level of uncertainty regarding Plan Change 78 and related plan changes and there are significant infrastructure problems that need to be resolved to provide for further growth in existing urban areas. These factors need to be balanced against the costs and relative efficiencies of developing greenfields land.
Structure Planning has not been undertaken for the existing urban areas to determine how best additional growth could be accommodated. Are there enough parks, community facilities, schools etc. The direction of a primary focus on infill will not achieve well-functioning urban environments.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Tell us why
This is a primary requirement for any robust planning process. It is an outcome of good design and solid assessment.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Tell us why
Natural hazards should be avoided but there are also opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why
This is a sound and basic premise for quality urban outcomes and well-functioning urban environments.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Appleby Road Limited seeks the draft FDS be withdrawn and a new FDS prepared once the HBA that Council is currently working on is completed. Any new FDS should be based on reliable factual robust data.

Appleby Road Limited seeks the FDS is amended from the draft to remove the indicative Proposed Area for Removal. The land should be retained as Future Urban. There has not been detailed analysis undertaken to evaluate all relevant factors that warrant removal of the zone. The land is required for the future urban growth of Auckland.

Appleby Road Limited wishes to speak in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

26 July 2023

Auckland Council
Private Bag 92300
Victoria Street West
AUCKLAND 1142

To whom it may concern,

FEEDBACK TO AUCKLAND COUNCIL'S DRAFT FUTURE DEVELOPMENT STRATEGY:

This Feedback responds to the provisions of the FDS in generic and specific ways including addressing the matters that Auckland Council has invited specific feedback on the Have Your Say webpage.

Submitter Details

This feedback is provided on behalf of:	Appleby Road Limited, the owners of [redacted]
Property or Interest Affected by the FDS:	Future Urban zoned land at Drury, and specifically [redacted]

Address for Service

Name: The Planning Collective
Attention: Burnette O'Connor

Email Address: Burnette@thepc.co.nz

Phone: [redacted]

Spatial Context and Background

The submitter has a particular interest in the land at [redacted]. The property is held in one fee simple title with the legal description of Lot 2 DP 477267 and has an area of approximately 3.7524 hectares.

Zoning and Location:
The land is zoned Future Urban in the Operative Part Auckland Unitary Plan ("AUPOP"), as shown in Figure 1. The identified Future Urban zone in the Unitary Plan was intended to identify the land required

for urban growth over a 30-year timeframe – 2010 through to 2040. The Future Urban zone was to provide certainty to developers, landowners, Council Controlled Organisations and other infrastructure providers. The Zone description in Chapter H18 states:

> *The Future Urban Zone is applied to greenfield land that has been identified as suitable for urbanisation.*

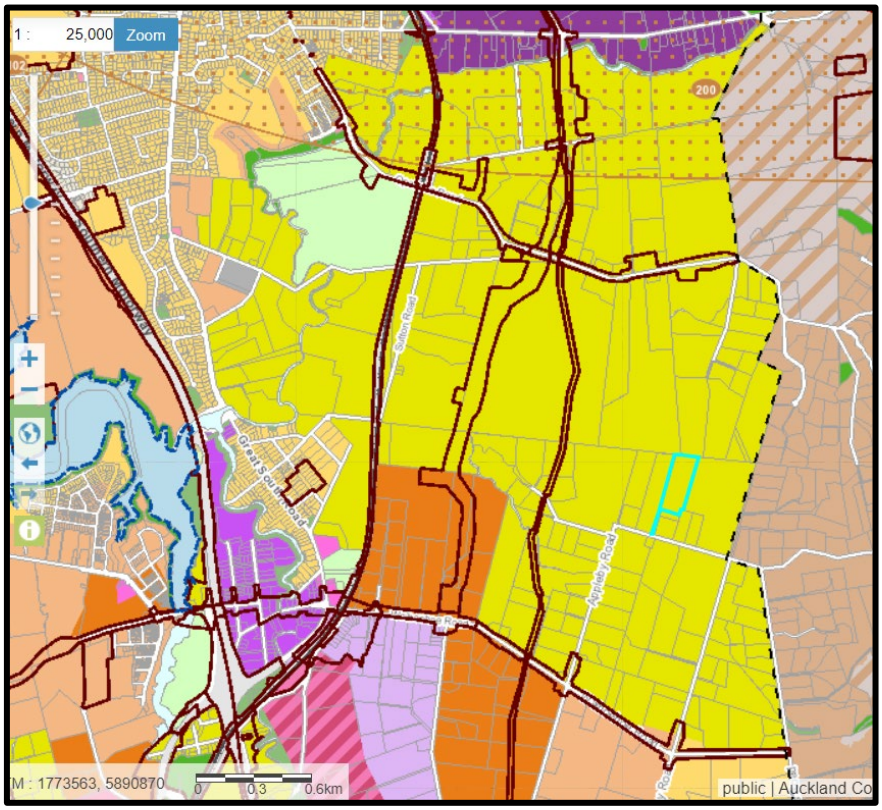


Figure 1 – Zoning and Designations (Source: AUP-OP, 25/07/23)



Figure 2 – Aerial image of subject site (Source: Auckland Council GeoMaps, 21/07/23)

Future Urban Land Supply Strategy 2017:

The Future Urban Land Supply Strategy 2017 identifies the site and surrounding area as being *Development Ready* in the first half of decade 2 – between 2028 and 2032- refer Figure 3 below.

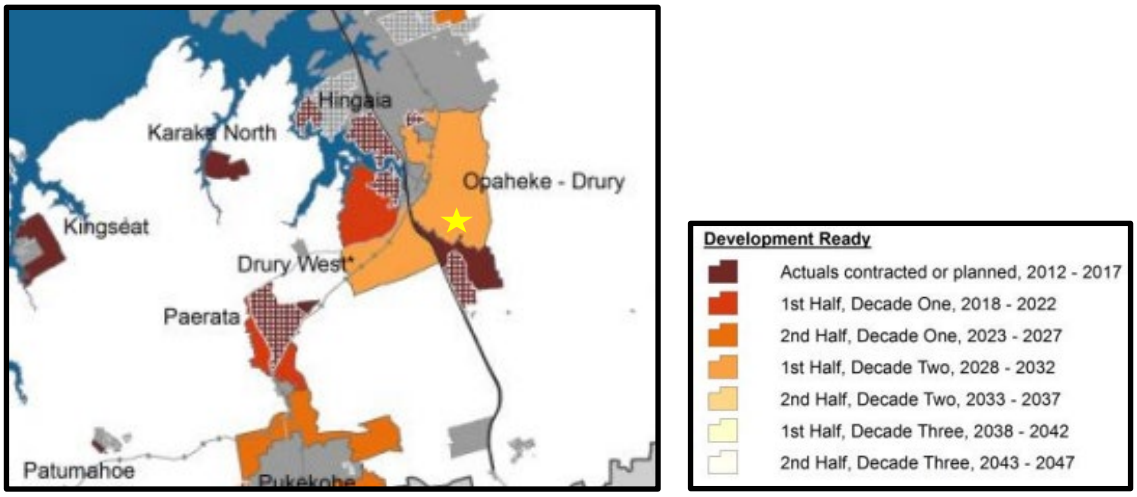


Figure 3 – Zoning of Drury under the Future Urban Land Supply Strategy and associated legend (Source: Auckland Future Urban Land Supply Strategy 2023-2053, July 2017)

The draft Future Development Strategy ("FDS") identifies the site and surrounding area Proposed Area for Removal (indicative) - refer Figure 6 below. The FDS states that areas identified as Proposed Area for Removal will be subject to future plan changes that will seek to zone the land Rural rather than the current Future Urban zone.

Auckland Council Adopted Drury – Opaheke Structure Plan – August 2019:

The land is incorporated in the Auckland Council Drury - Opāheke Structure Plan 2019 as shown in the snip on the following page:

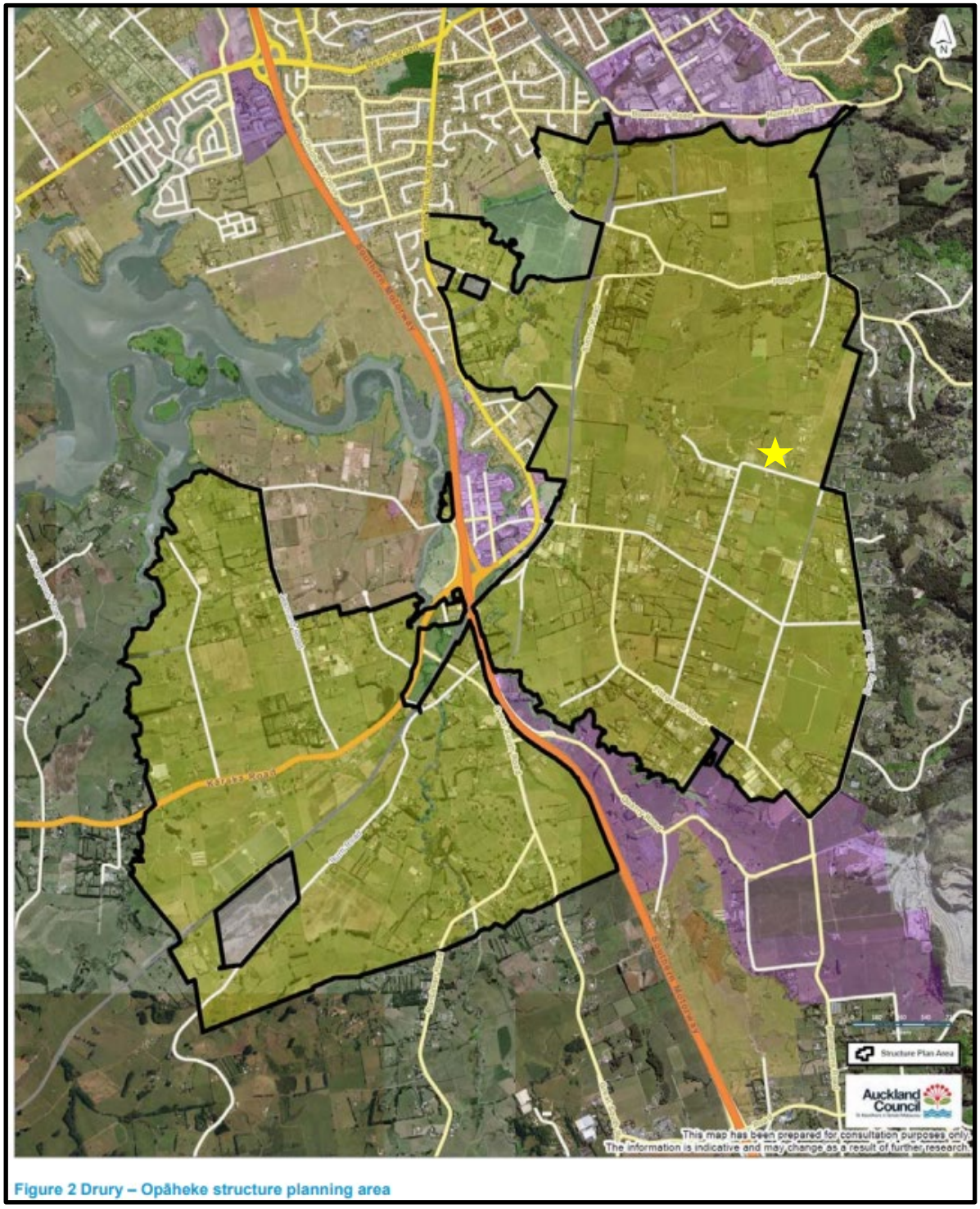


Figure 4 – Drury – Opāheke Structure Plan Area (Source: Auckland Council, August 2019)

The Drury – Opāheke Structure Plan Adopted by Auckland Council in August 2019, identifies the subject site as within the Opāheke portion of the Structure Plan area.

The Land Use pattern in the Adopted Structure Plan identifies the subject land as Residential – Mixed Housing – Suburban – refer Structure Plan Land Use Map Figure 5 below:

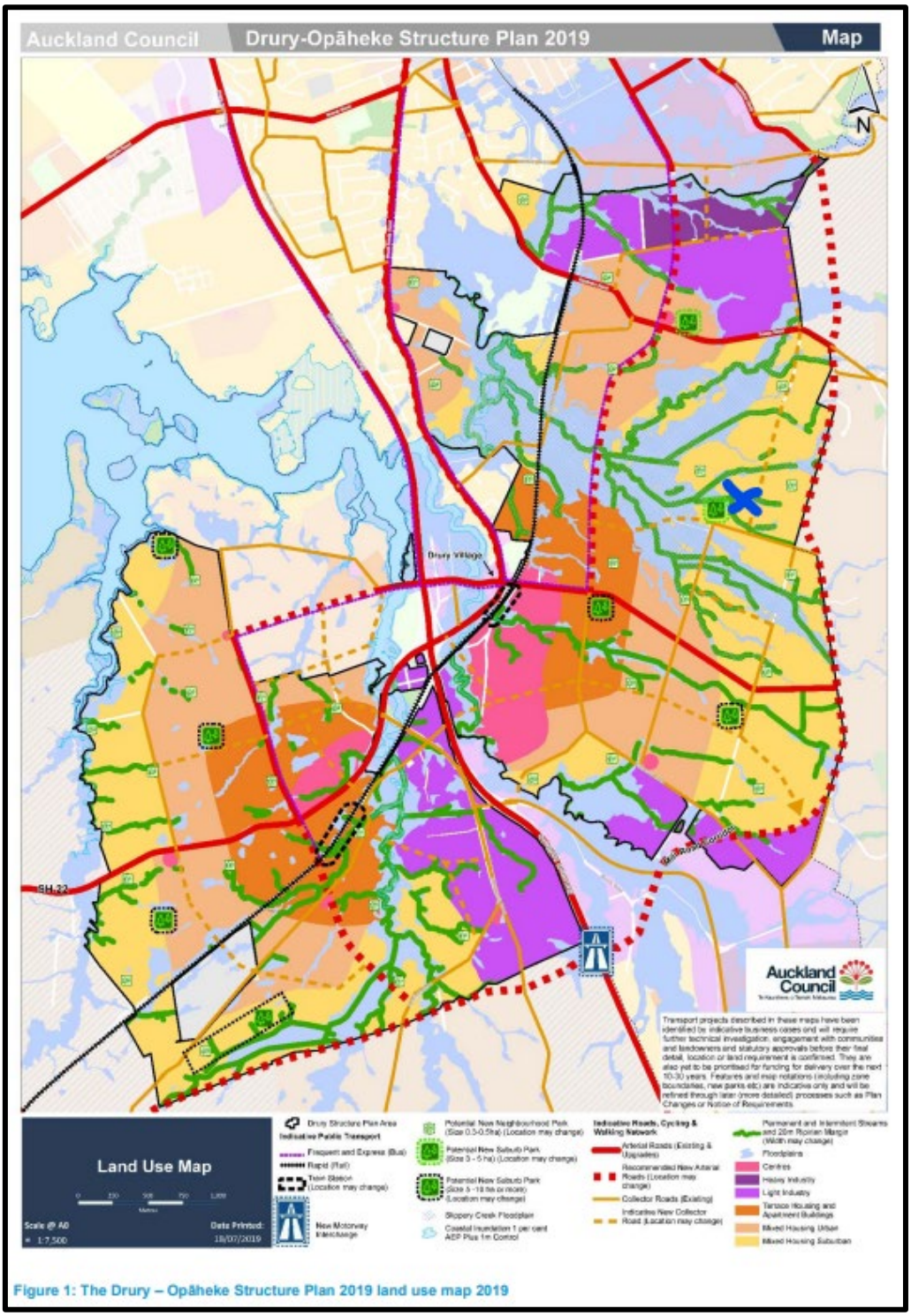


Figure 5 – Drury – Opāheke Structure Plan Adopted Land Use Map (Source: Auckland Council, August 2019)

The Structure Plan states the *development of the Future Urban Zone in Drury – Opāheke is part of the solution for addressing the growth challenge.* The Opaheke area is within the Slippery Creek catchment and the greatest risk has been identified as flood hazard. However, given the structure planning that has occurred, and the detailed stormwater modelling and Stormwater Management Plans prepared for the structure plan exercise and plan changes, there is sufficient land identified to enable urban development and avoid, or suitably mitigate flood hazards. Correctly at Section 3.10.1 of the Structure Plan it states, *Land use zoning within floodplain areas will need to be reviewed as part of future plan change processes.*

The land is north of recent plan changes 48 and 49 that have been approved in the Drury area – see Figure 6 below:

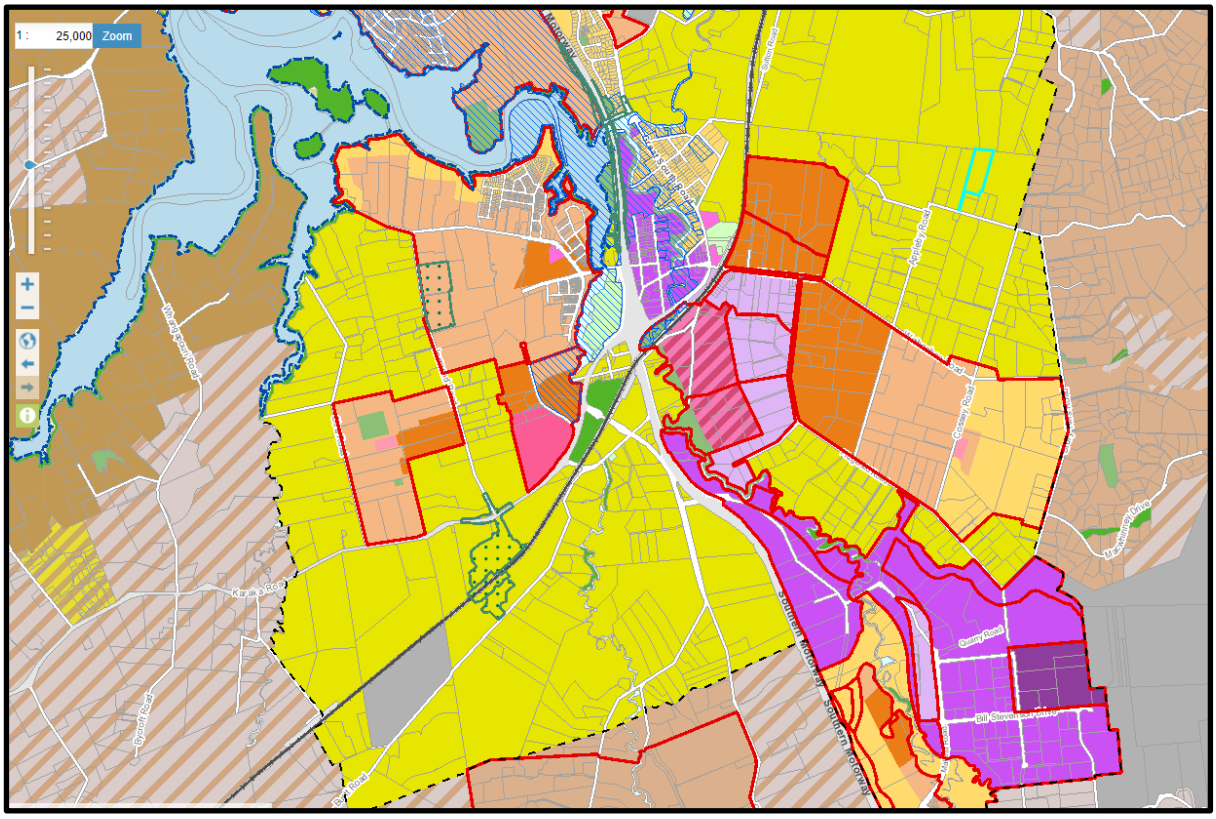


Figure 6 – Zoning of 218 Appleby Road, Drury within the wider area including recent rezoning via Drury plan Changes 48 and 49 (Source: Auckland Unitary Plan Maps, 21/07/23)

Draft FDS 2023:

The draft FDS identifies the land and surrounding area as *Proposed Area for Removal (indicative).*

> *Ōpaheke-Drury*
> *Ōpaheke-Drury is recommended for partial removal (of the area associated with the Slippery Creek flood plain and some land to east adjacent to the floodplain). The remaining parts of the FUA are to be renamed Ōpaheke (north of Slippery Creek) and Drury East (for land not live zoned). The reasons for this partial removal are:*
> - *Significant hazard constraints, including approximately 38% of the FUA covered by the 1% AEP flood plain. Flood plains in the area are wide in extent and deep, posing significant risks to development. There are also isolated pockets of areas subject to high risk slope instability and possible liquefaction damage. The Drury fault line also runs along the eastern boundary of the FUA. Recent studies demonstrate that this fault may be active.*
> - *A portion of the FUA to east of the Slippery Creek floodplain has been included to be removed. Although this area is not subject to the same level of natural hazard constraint, retaining it for development while removing areas of land within Slippery Creek to the north, south and west could result in poor urban form outcomes, result in reverse sensitivity effects, and a reduced ability to service the area with infrastructure.*

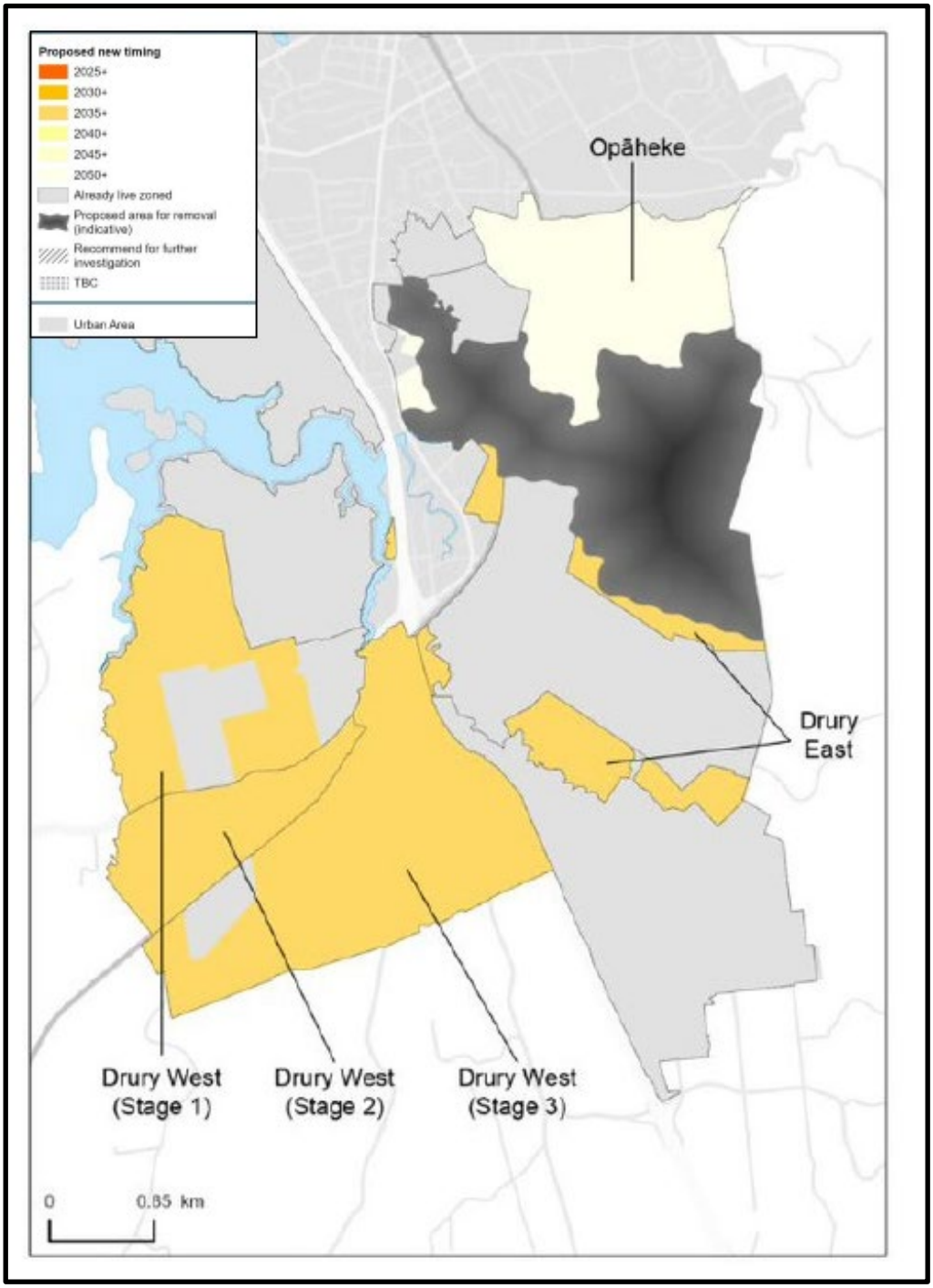


Figure 7 – Proposed timing of Drury under the proposed Future Development Strategy and associated legend (Source: Overview Document Auckland Future Development Strategy 2023-2053, June 2023)

Appleby Road Limited submits that the area of land identified to be removed in the draft FDS will achieve the outcomes stated above that the Council is seeking to avoid, namely *poor urban form outcomes, reverse sensitivity effects, and a reduced ability to service the area with infrastructure.* Appleby Road Limited seeks Auckland Council retain the area as Future Urban to enable certainty and to also enable the resolution of natural hazard risk avoidance and the creation of well-functioning urban environments that can be addressed in a detailed plan change process.

It is acknowledged that any future plan change will need to address natural hazard risk and the effects of climate change. Retaining a larger land area in the Future Urban zone provides greater opportunity for solutions to be realized.

Proposing to remove Future Urban zoning from the land creates a significant degree of uncertainty which is the exact situation the identification of the zone in the first place was seeking to avoid.

The Unitary Plan and the Structure Plan process undertaken by Auckland Council have the framework to address the full range of constraints on urban land development and the tools are available to ensure risks are appropriately managed. There are provisions in the resource Management Act to ensure land subject to significant natural hazards is not developed unless there are suitable conditions / mitigations in place.

Proposing to remove the area of Future urban zoned land at Opāheke is not in keeping with the purpose of the Future Urban zone as stated in s32 reports and analysis for the Unitary Plan, or in fact the Zone description. The FDS should be amended to retain the indications of the land for urban development and the timeframes for this should align with growth demand and infrastructure as required by the National Policy Statement Urban Development 2020 (updated May 2022) ("NPS UD").

Generic Feedback

The NPS UD requires every Tier 1 and 2 Local Authority to prepare a Future Development Strategy ("FDS"). Subpart 4 of the NPS-UD states that an FDS must be prepared and made publicly available *…every 6 years and in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority.*

The FDS must apply, as a minimum, to the urban environments of Tier 1 and 2 Local Authorities and can apply to a wider area. Auckland is a Tier 1 Local Authority.

Purpose of the FDS:

Clause 3.13 of the NPS-UD states:

(1) The purpose of the FDS is:
- *(a) to promote long-term strategic planning by setting out how a local authority intends to:*
  - *(i) achieve well-functioning urban environments in its existing and future urban areas; and*
  - *(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*
- *(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.*

(2) *Every FDS must spatially identify:*
   (a) *the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and*
   (b) *the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and*
   (c) *any constraints on development.*

(3) *Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.*

Clause 3.14 states the FDS must be informed by:

(a) *the most recent and applicable Housing and Business Development Capacity Assessment ("HBA"),*
(b) *a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS*
(c) *the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans*
(d) *Māori, and in particular tangata whenua, values and aspirations for urban development*
(e) *feedback received through the consultation and engagement required by clause 3.15*
(f) *every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement*
(g) *any other relevant national policy required by, or issued under, legislation.*

Clause 3.27 states that the effect of the FDS requires every local authority to have regard to the FDS when preparing or changing RMA planning documents and is strongly encouraged to use the FDS to inform long-term plans.

The FDS is thus a document of primary importance to the future planning for the urban growth of Auckland. It sets the framework for urban growth over the next 30-years and is the benchmark for how Auckland intends to create well-functioning urban environments. The FDS must provide capacity for the anticipated urban growth and set out how this will be achieved in a manner that fulfills Objective 1 and Policy 1 of the National Policy Statement Urban Development ("NPS UD").

If the identified land was required for the growth model that the Unitary Plan relied on, then it must also be required now. There is inherently uncertainty with respect to Plan change 78 and the ability for growth to be accommodated in the existing urban areas. The outcomes of the NPS UD will not be achieved by restricting and constraining the land areas identified as available for urban growth.

It is likely that growth will be delivered by private entities, not Council. This is demonstrated by the fact Auckland Council has prepared one plan change (Plan Change 5) in the time since the Unitary plan became Operative in Part. All other plan changes have been promulgated and delivered by private entities and development on the ground in terms of land development and housing is occurring. The Council plan change was withdrawn, and nothing has occurred.

Consultation and Engagement:

Clause 3.15 (2) and Clause 3.16 of the FDS states that when prepare the draft using the Special Consultative Procedure in s83 of the Local Government Act 2002, or when undertaking a review of the FDS the local authority must engage with the development sector to identify significant future development opportunities and infrastructure requirements. The requirements for a review of the FDS, Clause 3.16 (2) requires that the review must also include engagement with landowners.

Given the above Auckland Council must take into account feedback provided by land developers and they must consider the advantages and disadvantages of the various spatial scenarios that would be available as a result of inputs provided by the development sector to achieve the purpose of the FDS.

The draft FDS feedback must be taken into account in development of the final FDS. Because this is such a strategic document, submitters should be provided the opportunity to speak in support of their submissions and to attend a hearing in front of independent commissioners.

The Purpose of the FDS is set out above namely to achieve well-functioning urban environments in existing and future urban areas now and over the long-term.

Well-Functioning Urban Environment:

Well-functioning urban environment has the meaning set out in Policy 1 of the NPS-UD:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

The areas identified as Future Urban in the unitary plan were identified on the basis of constraints knowledge and the framework for structure plans and plan changes in the Unitary Plan require detailed assessment of natural hazard risks and the impacts of climate change. It is not rational, or well thought out, to remove areas currently identified as Future Urban without further detailed analysis being undertaken.

Specific Feedback in Response to Have Your Say

Focusing Growth:
Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time. We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Infill is not likely to achieve the amount of housing the Council has assessed. There is a high level of uncertainty regarding Plan Change 78 and related plan changes and there are significant infrastructure problems that need to be resolved to provide for further growth in existing urban areas. These factors need to be balanced against the costs and relative efficiencies of developing greenfields land.

Structure Planning has not been undertaken for the existing urban areas to determine how best additional growth could be accommodated. Are there enough parks, community facilities, schools etc. The direction of a primary focus on infill will not achieve well-functioning urban environments.

Accessible Local Centres:
When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.
We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

What do you think of our approach to focus development near local centres?

This is a primary requirement for any robust planning process. It is an outcome of good design and solid assessment.

Avoiding Hazards:
As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Natural hazards should be avoided but there are also opportunities to avoid or mitigate existing hazards through design and the detailed assessment of the structure planning and plan change process.

Resilient Infrastructure:
Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

This is a sound and basic premise for quality urban outcomes and well-functioning urban environments.

Conclusions and Outcomes Sought

Appleby Road Limited seeks the draft FDS be withdrawn and a new FDS prepared once the HBA that Council is currently working on is completed. Any new FDS should be based on reliable factual robust data.

Appleby Road Limited seeks the FDS is amended from the draft to remove the indicative Proposed Area for Removal. The land should be retained as Future Urban. There has not been detailed analysis undertaken to evaluate all relevant factors that warrant removal of the zone. The land is required for the future urban growth of Auckland.

Appleby Road Limited wishes to speak in support of their submission and seeks that hearings in front of independent hearing commissioners be held given the strategic importance of the FDS to current and future planning processes.

Yours sincerely



Burnette O'Connor
The Planning Collective Limited
Email: burnette@thepc.co.nz
[redacted]

Future Development Plan 2023 #8414

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

There are real concerns by property owners and developers on the effects of the rezoning and delays to releaseing Greenfield land previously identified in Council's Future Urban Land Supply Strategy report released in July 2017. Particulary as significant water and wastewater services have been built to service these areas such as Kumeu Huapai.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

I support Council's aspirations to increase the amount of development land with ready access to employment, public transport and services. However, I do not support Council's approach to how

it is planning, delivery and the proposed review for the towns of Kumeu and Huapai. Better direct consultation with land owners should be taking place.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why

I find it surprising that Council now finds itself having to review the Auckland Unitary Plan (AUP) document around managing hazards and areas zoned Future Urban within such a short time frame of the AUP being adopted. The possible removal of the future urban zoned land north of Station Rd, Oraha Rd, and west of Riverhead, shows that little confidence can be had in

Council decisions around hazards and future urban zoned land.

Noting that not all land zoned Future Urban will be developed/built on, as some will be required for public parks and open space.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Agree

Tell us why

We support nature-based infrastrucure solutions that are appropriate for the location, outcomes and the environment. Nature based solutions must be fit for purpose, recognising existing constraints and the desired outcomes. Non-nature based solutions should not be excluded as they may be required to achieve the desired outcome within the space available.
However, Council and its CCO's do not hold itself to the same standards with proposed piping of streams lowering flood resilience as outlined in the proposed North West Notice of Requirement documents.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

If Council is proposing to review the zoning and extents of Kumeu and Huapai, this raises serious questions around the Notice of Requirments (NoRs) and transport plans that are about to enter hearings phase. As the population forecast will change signficantly by Council's proposal, the propsed transport works are likley need to be scaled accordingly. In addtion, if there is a significant delay to zoning future urban land outside the main urban area, this raises question around the timing of the NoRs. This creates more uncertaintiy for land owners and developers, adding stress and costs to the private sector, as Council and its CCO's plans and implementation works are not aligned.

Future Development Plan 2023 #8417

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

According to who? There are so many research studies to the contrary.
Road network cannot cope. Council has made the future urban areas long ago, people- rate payers- have made personal and financial decisions based on that - now you change the goal post - again - who carries the loss? You are playing around with people lives and futures at will. Your research is flawed re more concentrated urbanization - why are people leaving Auckland and NZ in record numbers?

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

Not true- It adds to congestion - remote work is and will be the future.

This question is ambiguous.
The area we are in is earmarked future urban - it is attached to a local centre - so how do you answer this question - if we answer yes then we agree with all you do - if we answer No then this area is deemed what? not near a local centre.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Other

Tell us why
It depends who does the research and who has input that will be considered - if an area is a flood zone and so identified with FACTS and historical facts and records - then yes. But some "consultants" opinion is worth nothing - they will always give the right answer to those who pays his invoice.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Disagree

Tell us why

This is an "escape" clause - you re using "words" to appease people to make your case look appealing - Population will grow - you can't stop it - we need more space - I agree consider the environment - but it does not mean that we stop growing and developing.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

The council is playing monopoly with peoples properties and lives. We have recently received notification that the road re-alignment is going right through our house, now you want to change the zoning "again". I know the only reason all this is being re-considered is because the council cannot afford the required infrastructure - just give them the space to do it without all the RMA to go through. I am upset about all these proposal changes, we work a lifetime to pay our properties, we make decisions for the future based on the councils' future plans - Then to be told a road is going through our house, now the land we have will not be able to be developed - yet we pay the rates. The council is there to act on the best interest of the ratepayers, they work for the ratepayers, yet the ratepayers have no say. In my experience all consultations are just paying lip service to the process. If the council cannot afford the infrastructure based on its current development plan - then say so - we understand - but don't come with flawed, one-sided research about intensified living.

Allow the opportunity for developers to do their own infrastructure - the council can still have an input in environmental matters but don't have to pay for it. Your time and consideration very much appreciated.

Future Development Plan 2023 #8423

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Your feedback

Focusing growth

Denser, more compact cities result in improvements to the environment, the economy, and people's wellbeing.

Auckland's urban area is made up of neighbourhoods, town centres and business areas that are interconnected and that support where most Aucklanders live, work and spend their leisure time.

We propose that most housing and business growth will be focused within existing urban areas and that this growth be more intensive. This means less growth in greenfield areas at Auckland's edges. What greenfield growth there is will be phased over 30 years and longer.

1. What do you think of our approach to focus most of Auckland's growth in existing urban areas?

Disagree

Tell us why

The full health effects of intensification on people and communities has not been documented or suitably considered.

This includes emission pollution by vehicles of all types on respiratory health and wellbeing; noise effects from vehicles and aircraft particularly helicopters at night time, Greenspace particularly active recreation areas are insufficient as is most social infrastructure.

Greenfield provides a suitable option for more affordable family oriented dwellings applying the principles of live work play within a self sufficient sub regional.

basis.
Infrastructure provision is inherently cheaper which informs more affordable housing options more readily supplied.

Accessible local centres

When people have easy access to workplaces, services, facilities and shops, communities become more resilient and connected. It also helps to reduce travel time, emissions and lower household transport costs.

We propose focusing housing and business development near local centres where most people's daily needs are easy to access by walking, cycling and public transport.

2. What do you think of our approach to focus development near local centres?

Other

Tell us why

A balanced approach is required recognising that some forms and intensities of development is suitable within say a 800m radius rather than all activities.
Example, some commercial and business needs are large template operations with extensive land use needs requiring sub regional and generally new greenfield locations, but still in relative proximity to strategic transport networks.

Avoiding hazards

As our climate changes, the frequency and severity of hazards such as flooding, sea-level rise and coastal erosion will worsen. Where and how we plan for growth, and how we adapt to these hazards is increasingly important.

We propose that known areas constrained by significant natural hazard risk should be looked at to see if further development is appropriate.

Where development is already enabled in potentially vulnerable locations, we will further investigate appropriate actions.

3. What do you think of our approach to avoid further growth in areas which are exposed to significant risk of environmental hazards?

Agree

Tell us why
Common sense; unless there are design mitigation measures in place.

Resilient infrastructure

Infrastructure across Auckland needs to cope with ongoing change, such as the impacts of climate change and evolving technology.

Nature-based infrastructure, such as rain gardens, swales, and detention basins, is better able to respond to ongoing change. This can help protect communities from hazards, as well as protect and restore the natural environment.

We propose prioritising investment in infrastructure that is decentralised, nature-based, regenerative and mauri-enhancing.

4. What do you think of our approach to prioritising nature-based infrastructure that responds to the impacts of climate change?

Other

Tell us why

Resilient infrastructure can be engineered and nature based; they are not mutually exclusive and are what is relevant or fit for purpose for a specific location.

Other feedback

5. Do you have any other feedback on our approach to how and where Auckland should grow and change?

Yes. Harbour View Heights LP own land at 28,30,66 Crestview Rise Papakura that subject to rezoning is capable of providing approx. 65-70 dwellings. The land is commercially feasible and infrastructure ready (with no additional public sector cost) on the periphery of existing urban area and adjacent new subdivision. The land has no significant natural hazards, there is an ability to restore and protect the natural environment and stormwater design measures can be applied to provide a holistic water sensitive response both in quantity and quality management.

The subject land is presently being evaluated for rezoning with a plan change application from Countryside Living to Mixed Housing Urban (including concurrent RUB movement) contemplated under MDRS within a precinct planning approach. That application is expected to be lodged in the last quarter of 2023. Community and stakeholder consultation has recently commenced.

The land (being lots 123,124,127) should be identified in the FDS as future urban, and identified for development purposes within the period 2025 -2030

Development within this time period will provide the immediate and progressive supply of residential dwellings in a quality compact manner while ensuring a well functioning environment with infrastructure provision and housing supply aligned...

Attachment: Letter sent to Papakura Local Board with key information on site, proposed zoning and development concept. Similar letters sent to nearby residents and iwi.

#8423

23 June 2023

The Chairperson

Papakura Local Board

Attention: Brent [redacted] (by email)

Dear Brent

Advice on Proposed Community Consultation and Feedback Sought on Proposed Private Plan Change and Rezoning of land at [redacted] and [redacted] Crestview Rise Papakura

Harbour View Heights LP is the landowner of the above properties (approximately 3.0ha) and is preparing a private plan change application that seeks the rezoning of the land at the addresses above from a Countryside Living zone to a Mixed Housing Urban zone over approx. 1.9ha of the combined sites.

Harbour View Heights is the subdivider and developer of land that established the adjacent Crestview Rise and other nearby roads and some dwellings.

An application for rezoning and extension of the Rural Urban Boundary will be made to Auckland Council in coming months.

This letter is to inform you of the proposal that is being consulted on (to nearby residents and mana whenua) and welcome your interest and feedback from you or the Board. The local Ward Councillors Angela Dalton and Danial Newman have also been sent the information. There may be an opportunity to discuss the nature of the proposal with you or respond to any queries.

The Proposal

The proposed rezoning for the site is Mixed Housing Urban (the same zoning proposed for the adjacent urban area under Council's PC78) and is considered appropriate and a relevant residential zone under the AUP and 2021 RMA Amendment introducing MDRS.

The design and anticipated development will be managed through a Precinct. Application of the Precinct will define expected outcomes and a management response that seeks to avoid and mitigate potential effects on the neighbourhood, any specific matters of significance to iwi, while ensuring a quality compact urban form (will be enabled) within the context of a well-functioning urban environment.

The future plan change application will be supported by the following plans, refer link https://www.urbanformdesign.co.nz/crestviewriseplanchange and other supporting technical reports. In essence the change will enable the following:

- 37 residential lots
- 65-70 residential dwellings, a mix of detached and duplex
- 2 JOAL's (jointly owned access lots)
- Extensive landscape planting and vegetated buffer with legal protection
- Existing bush restored, enhanced and protected (eg consent notice or covenant)
- Appropriate on site engineered stormwater management measures

The outcome of the zoning would enable the subsequent subdivision and the development of two residential enclaves that integrate with the existing Crestview Rise subdivision, typically consisting of 2 storey duplex or townhouse dwellings. One is centred around Kotahitanga Street – approx. 20 dwellings and the other abutting Crestview Rise accessed through a JOAL for some 50 dwellings.

The development form will be wrapped around extensive landscape planting including the higher parts of the site and ultimately integrate with existing bush within the Countryside Living Zone, which it is proposed to restore, enhance and ultimately protect on lots [redacted] and [redacted]

Vehicular access and supporting easement will also be provided to service the Watercare reservoir adjacent the site, at their request.

If you would like further explanation of aspects of the proposal or have any queries or comments to make, you are welcome to contact me by email [redacted] or phone me [redacted]
If you would like to meet in person with the landowner or any of the technical team, please also contact me.

Thanks for your time to consider the information and plans. Your response (if any) is welcome by 30 July.

Yours sincerely

[redacted] on behalf of Harbour View Heights LP

Planner

MNZPI

[redacted]

ph [redacted]

[redacted]

Plans and info in the website link:

1. Urban Form Design Plan Package
2. 4Sight Landscape Plan Package
3. Envelope Draft SMP Summary